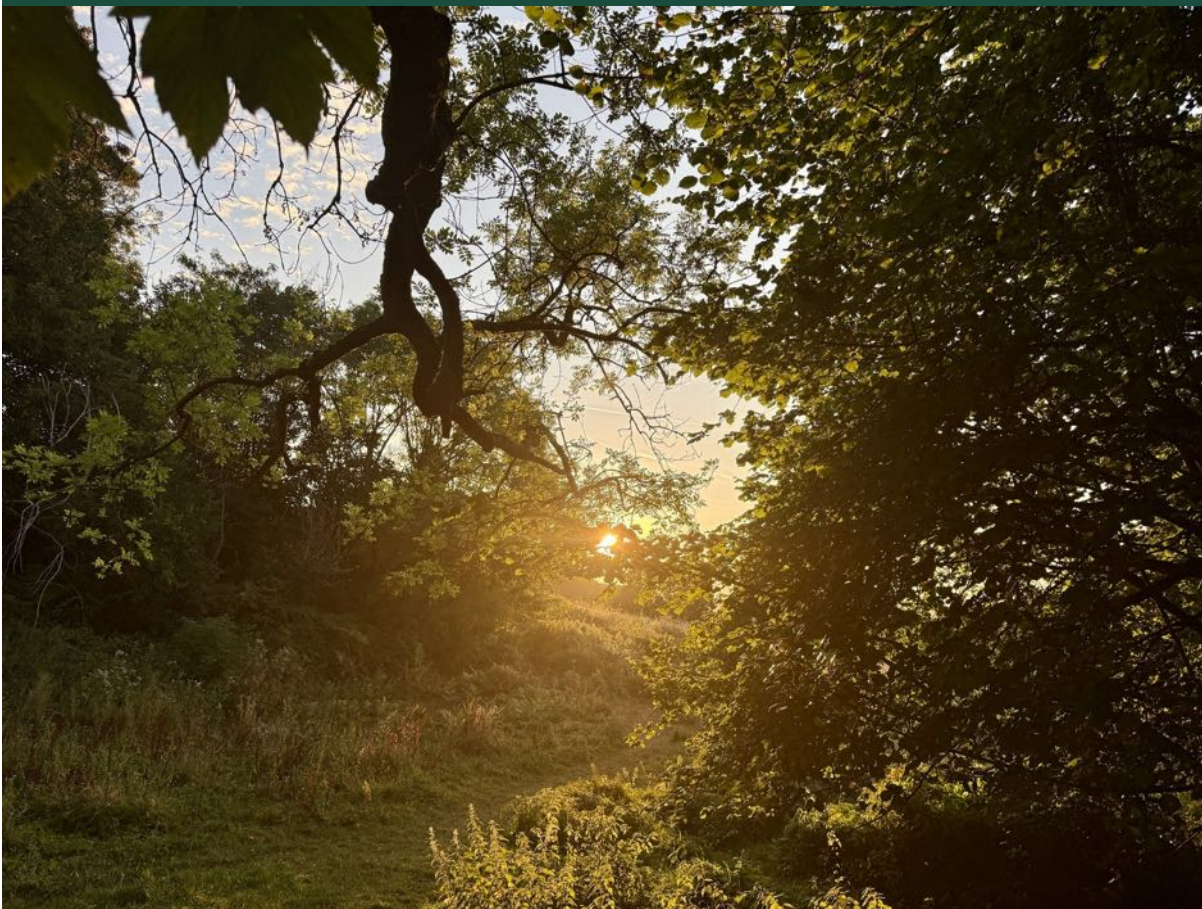


A COMMUNITY BRIEFING

500 homes around Weston Big Wood

The community case for removing both the Tower Farm (up to 400 homes) and Black Rock (c.100 homes) allocations from the North Somerset Local Plan — and how you can help



Sunrise in Weston Big Wood. This is what is at stake: an irreplaceable ancient woodland and Site of Special Scientific Interest on the edge of Portishead. Photograph by Portishead residents.

Prepared by Portishead residents August 2026 edition, v3.9

A community information document prepared by local residents. It is not professional advice and it is not an official publication of any council or agency. Every factual claim is referenced to a public source in the Evidence Register (Appendix B).

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1 Introduction

If we get this right, the case against Tower Farm is not a shouting match — it is a careful, sourced argument that an Inspector and a case officer can rely on. That is what this pack is for.

1.1 The case in one page

Tower Farm is 28.32 hectares of long-established pasture on the edge of Portishead, in the Green Belt, directly alongside Weston Big Wood — a Site of Special Scientific Interest and ancient woodland owned and managed by Avon Wildlife Trust.^{E1 E3}

The draft North Somerset Local Plan allocates the site for up to 400 homes, promoted by Parker Strategic Land (PSL) — with a second allocation, Black Rock (c.100 homes), on the wood's far side. The plan is now at independent examination, and that examination — not any planning application — is where the decision that matters is being made. There is no planning application today. The campaign's aim is simple: persuade the Inspectors that both sites should come out of the plan.^{E10 E15}

Six reasons these allocations fail — the Green Belt and the wood first

1. The Green Belt here is deliberate — and the 'grey belt' label is misapplied. The adopted 1988 Green Belt plan drew this boundary expressly to protect Weston Big Wood and the setting of the Gordano Valley — land 'which should be retained open', not held in reserve for development. Under the NPPF, land where SSSI and ancient woodland policies provide a strong reason to restrict development is excluded from grey belt (footnote 7). This is pasture beside a nationally designated SSSI — not a car park or derelict forecourt.^{E8 E25}

2. It threatens an irreplaceable ancient woodland already in decline — from both sides at once. [Natural England's own published assessment](#) records Weston Big Wood SSSI as 100% 'Unfavourable – Declining', and both recorded active pressures on the site are recreational-disturbance impacts. With Tower Farm on one flank and Black Rock on the other, some 500 new households would close in on the wood from both sides — and no one has assessed that combined pressure. National policy (NPPF paragraph 193) treats ancient woodland as irreplaceable.^{E3 E7 E8}

3. It severs the wildlife corridor linking three SSSIs. The pasture links Weston Big Wood to Nightingale Valley and the Gordano Valley SSSIs — a corridor the made Neighbourhood Plan itself maps and protects. The Council's own 2025 assessments record Tower Farm as suitable foraging habitat for greater and lesser horseshoe bats, and find the site has the potential for adverse impact on land functionally linked to a protected bat site.^{E5 E6 E9 E27 E28}

4. It takes habitat used by red-listed birds — and no one has surveyed it. Dated, attributed public records show Red List bird species in both habitats this allocation affects: nine at the wood (seven recorded since 2023, five in 2026 alone) and a distinct farmland assemblage on the pasture — wintering Lapwing in flocks of up to 350, and Skylark. The allocation's evidence base contains no bird survey at all.^{E30 E31}

5. The access is not safe or suitable. The sole vehicular access for up to 400 homes is via The Downs — a residential cul-de-sac network beside High Down schools, already congested at school-run times. The developer's own material confirms Tower Road is for emergency, pedestrian and cycle use only.^{E1}

6. Its promised benefits are not deliverable. The school improvements depend on land the developer does not control. So do the Merlin Park proposals. Rights-of-way diversions are unconfirmed, an oil pipeline easement crosses the site, and no viability appraisal has been published. Elsewhere in this examination the Council has shown what real deliverability evidence looks like — Tower Farm has nothing comparable.^{E1 E10}

KEY FACT

Even a rival housebuilder said 'No'

In the Additional Sites consultation, 196 of the 210 people who commented on Tower Farm (93%) said the site was not suitable for housing. Among them was Persimmon Homes Severn Valley — a national volume housebuilder actively promoting a competing Portishead site — which formally answered 'No' to the site's suitability. See section 3.1.^{E14 E21}

What you can do this week — three urgent actions, under twenty minutes

- Email your ward councillors (5 minutes) — ask them to support the removal of both sites from the Local Plan, and to press the Council to put that change to the Inspectors while the examination is still running. Template ready in this pack.
- Complain to North Somerset Council about its Environmental Impact Assessment (EIA) screening decision (10 minutes) — on 24 July 2026 the Council decided no EIA is required at Tower Farm, over the settled objections of its own Lead Local Flood Authority, the Internal Drainage Board and Portishead Town Council. Template ready in this pack. See section 2.3 for why this matters, and section 4.2 for the ask. ^{E33}
- Sign the community petition — c.org/jtSDcnf5nT — and enter your postcode when the form asks: that is how local support is counted and evidenced for Number 10. If Change.org asks for a donation afterwards, you do not need to pay — the money goes to Change.org, not the campaign. Skip it and send the petition to three people instead. The full plan — urgent, important, reserve — is at section 4.2.

1.2 How to use this pack

Different readers need different things. Go straight to what you need:

If you want to...	Go to...
Understand the case in two minutes	Section 1.1 — the one-page summary
Read the environmental arguments — the Green Belt, the wood, the wildlife	Section 2
Read the strategic arguments — access, alternatives, deliverability	Section 3
Take action — who to write to, timing, contacts	Section 4 and Appendix F
Meet an acronym or term you don't know	Appendix A — the plain-English glossary. Worth a glance before sections 2 and 3
Check any fact for yourself	Appendix B — Evidence Register, every claim sourced
Follow what has happened and what is coming	Appendix C — campaign timeline
Open the original documents yourself	Appendix D — sources and links
Start writing	Appendix E — templates T1-T5, ready to personalise
Find an address or a phone number	Appendix F — useful contacts

1.3 Where this is decided: the examination now — an application, perhaps, later

Two processes could decide this land's future — but only one of them is live. Everything in this pack is tagged so each argument stays in its proper place. In section 4 the tags sit on the individual actions rather than on the section.

EXAMINATION TRACK

LIVE NOW. The Local Plan examination. Independent Inspectors are testing whether the plan — including the Tower Farm and Black Rock allocations — is 'sound' and legally compliant. Arguments here go to the soundness tests: is each allocation justified, effective, positively prepared and consistent with national policy? This is where the campaign's energy belongs.

APPLICATION TRACK

LATER, IF AT ALL. A planning application. None exists today. If Parker Strategic Land applies in due course, objections will go to North Somerset Council and will have their moment — this pack will be updated when that happens. Until then, treating a future application as today's fight hands the developer the framing it wants: a scheme that looks already decided. It is not.

A note on tone and accuracy: this pack deliberately understates rather than overstates. Every claim is sourced; where something is our judgement rather than established fact, we say so. The campaign's credibility with Inspectors, officers and councillors depends on it.

1.4 The site, the scheme, and the developer's case fairly stated

A good case engages the developer's strongest arguments, not a caricature of them. This page states what Parker Strategic Land proposes in its own words; sections 2 and 3 show — from its own documents and public records — why it does not hold.

The scheme. Parker Strategic Land promotes up to 400 homes on 28.32 ha of long-established pasture — seven field parcels off Tower Road and The Downs, averaging around 30 dwellings per hectare and rising to 45 dph at the centre. Its examination representations and technical work are prepared by Ridge and Partners LLP; Turley leads its planning promotion and public consultation. The site was added to the draft Local Plan allocations in June 2025 following the Additional Sites consultation. ^{E1 E15}

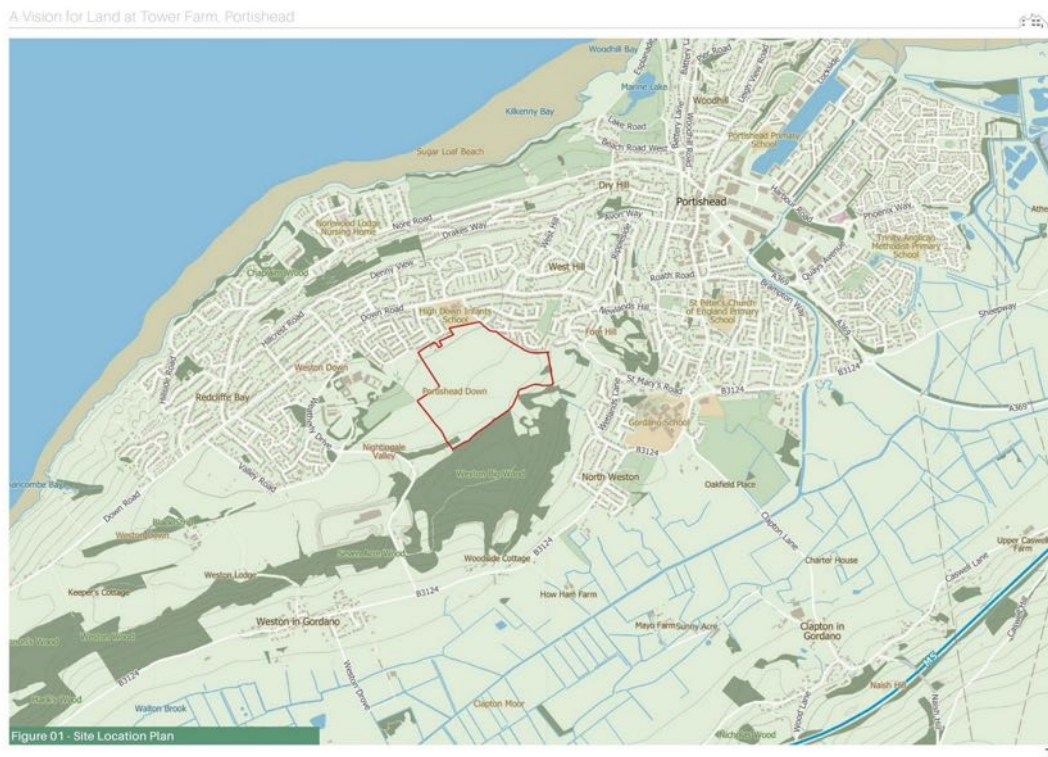
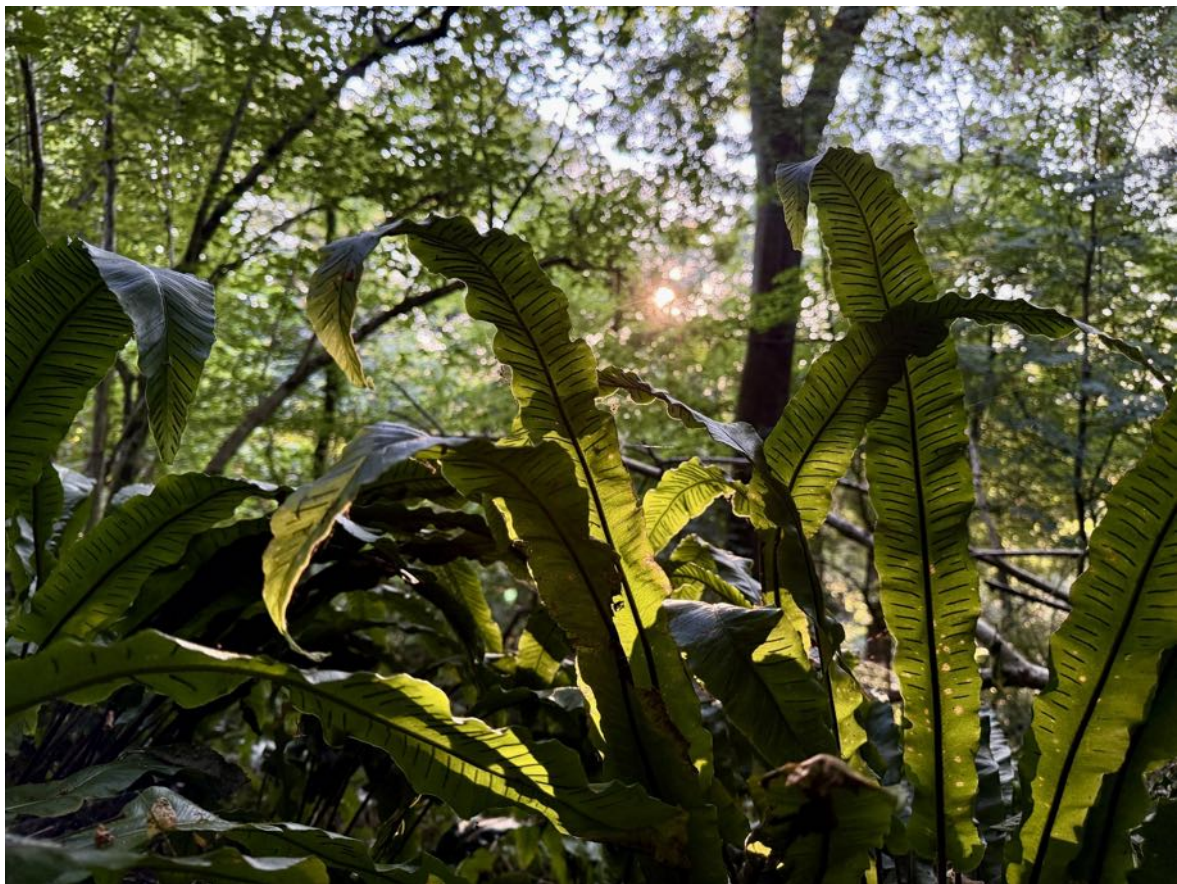


Figure 1 — Site Location Plan. Source: Parker Strategic Land, Vision Document for Land at Tower Farm, Portishead (April 2022), reproduced unaltered for the purpose of review and criticism of a public planning promotion document. The figure numbers used throughout this pack are the developer's own. The red line is the promoter's own site boundary — long-established pasture between the built edge of Portishead, High Down schools and Weston Big Wood.

Their case, fairly stated: the site adjoins the built-up edge of Portishead; the Council's Green Belt assessment rated its contribution 'low'; a 50m buffer would protect the ancient woodland; facilities are within walking distance; a school drop-off area, Merlin Park improvements and green infrastructure would deliver community benefit. This pack engages with that case honestly — and shows why it does not hold. ^{E1}



Figure 14 — Illustrative Masterplan. Source: PSL Vision Document (April 2022), reproduced unaltered for review and criticism. Note the single vehicular access at The Downs, immediately beside High Down Infant and Junior Schools, and the site boundary running against Weston Big Wood.



And what the masterplan would build beside: hart's-tongue ferns at first light inside Weston Big Wood — the ancient woodland the site boundary above runs against. Photograph by Portishead residents, 3 August 2026.

2 The environmental arguments

This is the heart of the case, and it leads for a reason. The Green Belt here was drawn deliberately, in 1988, to protect Weston Big Wood and the setting of the Gordano Valley — and the ‘grey belt’ relabelling of that land does not survive contact with national policy. The harm is not abstract: an ancient woodland already in recorded decline, facing some 500 homes closing in from both sides at once. Each argument below could, on its own, be enough to justify removing these sites from the plan.

Acronyms and technical terms are explained in plain English in the glossary at Appendix A.

What is protected here, and by what. Six designations bear on this land. Every one of them is a matter of public record, and every one is checkable at Appendix D.

Designation	What it is, and what it protects
SSSI	Weston Big Wood — biological Site of Special Scientific Interest and ancient woodland, 37.66 ha, notified 3 January 1984; owned and managed by Avon Wildlife Trust. It forms the site’s southern boundary.
Ancient woodland	Irreplaceable habitat under NPPF paragraph 193, and exempt from biodiversity net gain offsetting — it cannot be recreated or traded away.
Green Belt	Placed in the Green Belt by the South West Avon Green Belt Local Plan, adopted by Avon County Council in 1988 — a boundary drawn expressly to protect the setting of the wood (section 2.1).
Hedgerows	Mature hedgerows along the field boundaries, recorded by Portishead Town Council as approximately a mile in length, most of it internal to the site and most of it lost to the proposed layout.
Wildlife corridor	The pasture links Weston Big Wood to Nightingale Valley SSSI and the Gordano Valley SSSI and National Nature Reserve; the made Neighbourhood Plan maps the corridor as LGB12.
Priority habitats	Mature hedgerows along the field boundaries, and a traditional orchard record on the national Priority Habitat Inventory at the northern boundary (section 2.7).

The designations in play at Tower Farm. Sources: Natural England Designated Sites View; the national planning data register; the adopted 1988 Green Belt Local Plan; the made Portishead Neighbourhood Plan; the Priority Habitat Inventory.



The long-established pasture at Tower Farm, on the rising ground east of Portishead. Photograph by Portishead residents, summer 2026.

2.1 Green Belt, deliberately protected — and the misapplied ‘grey belt’ label

BOTH TRACKS

What grey belt was meant to be. [The December 2024 NPPF](#) created ‘grey belt’ to unlock previously developed and low-value Green Belt land — the disused car parks and derelict forecourts of ministerial speeches. The definition (paras 155–157) has a built-in safeguard: land is excluded from grey belt where the policies protecting the assets in footnote 7 — which include SSSIs and ancient woodland — provide a strong reason for refusing or restricting development.^{E8}

The national picture. [CPRE’s December 2025 research](#) finds the policy operating far from its stated purpose: across the thirteen major inspector-approved schemes it examined — which between them account for more than 90% of all homes granted on grey belt sites — 88% of the 1,250 homes will be built on previously undeveloped countryside. Tower Farm is a live test case of that stretch — long-established pasture, in the Green Belt, beside a nationally designated SSSI, relabelled grey in the Council’s own evidence base and then adopted by the promoter. And the safeguard itself is now under review: in December 2025 the Government published a consultation draft of a revised NPPF that would remove the footnote 7 exclusion from the grey belt definition altogether. The consultation closed on 10 March 2026 and no final version has been published — this examination is governed by the current framework, in which footnote 7 stands — but the proposal raises the stakes, and it makes the national ask in section 4.5 sharper and more urgent.^{E13}

The local application. Two independent failures. First, footnote 7 is directly engaged and was never tested. The Council’s own Stage 2 Green Belt Assessment screened this parcel against footnote 7 by recording the absence of scheduled monuments; it does not engage with Weston Big Wood SSSI or the ancient woodland at all. Their presence is precisely the ‘strong reason’ the exclusion exists for — a wood Natural England records as declining, with ash dieback and honey fungus named as the primary causes and recreational pressure recorded as adding to them and likely exacerbating their impacts. Second, even if the grey belt label survived, the underlying protections (NPPF 193, DP35, the Habitats Regulations) operate in their own right. The question then becomes whether a 50m buffer is enough to prevent harm — and section 2.2 shows it is not. The developer’s own assessment, meanwhile, concedes the site’s contribution to Green Belt purpose (c) (safeguarding the countryside from encroachment) and its visibility across the Gordano Valley.^{E1 E8 E35}

How this land came to be called 'grey belt'

The label has a documented origin, and it is not the developer's. On 30 October 2025 Arup, reporting for the West of England Combined Authority, assessed the strategic Green Belt parcel within which this site sits (parcel P-002). It named Weston Big Wood SSSI and the ancient woodland, and warned that the extent and scale of constraints within the parcel may make it unsuitable to be considered grey belt — recommending further assessment at a later stage. That further assessment was never carried out. In October 2025 North Somerset Council's own Stage 2 Green Belt Assessment classified 'Portishead 6 – Tower Farm' as grey belt anyway. Parker Strategic Land then adopted the Council's classification in its Regulation 19 representation of 9 December 2025; it ran no grey belt assessment of its own. In May 2026 the Council's Regulation 22 Consultation Statement recorded that there are no SSSIs in the vicinity of the allocation. On 24 July 2026 the Council screened out an Environmental Impact Assessment for the same land. E33 E35 E36 E37 E38 E39



The label came from the Council's own evidence base — not from the developer.

How the "grey belt" label travelled — and the Council's own report that warned against it. Sources: NSC Stage 2 Green Belt Assessment (October 2025); Arup for the West of England Combined Authority, Strategic Green Belt Assessment Stage 1 Interim Report (30 October 2025); Parker Strategic Land Regulation 19 representation (9 December 2025); the promoter's public consultation material (July 2026).

Stated plainly. The Council classified as grey belt a parcel its own commissioned adviser had flagged as possibly unsuitable for that label, on account of the very assets — an SSSI and ancient woodland — that footnote 7 exists to protect. Its footnote 7 screening for this parcel records only that there are no scheduled monuments; it does not engage with the SSSI or the ancient woodland. That is a hole in the Council's evidence base rather than in anyone's good faith; it is also exactly the kind of gap the examination exists to test.

What the label actually does. This is not a labelling quibble. Under NPPF footnote 55, and the [Planning Practice Guidance that follows it](#) (paragraph 64-014), grey belt and previously developed land are excluded from the requirement to give substantial weight to Green Belt harm, including harm to openness. Call the land grey belt and the single heaviest protection it has falls away. Everything else — the buffer, the access, the ecology — is then argued on a discounted scale.^{E8}

Openness is not only what you can see. The Guidance is explicit that openness includes the degree of activity likely to be generated, such as traffic generation (PPG 64-013). Four hundred homes served by a single access through a residential cul-de-sac beside two primary schools is a change in openness on the Government's own definition, not merely a highways problem. The Guidance also confirms that development of grey belt land in an unsustainable location remains inappropriate regardless of the label (PPG 64-011).

'Provisionally identified' is not an answer. The Guidance allows a plan-making authority to identify grey belt provisionally (PPG 64-006). That does not rescue this allocation. The threshold for identification is deliberately low — land that could potentially be grey belt (PPG 64-003) — so a provisional label proves nothing about the footnote 7 question. NPPF paragraph 145 requires Green Belt boundaries altered through plan-making to be capable of enduring beyond the plan period. And the consequence of the label is not provisional at all: it is what allows the harm to be discounted, and once the allocation is adopted the land is gone.

Why this drives who we contact

The grey belt argument operates at three levels, and the campaign’s asks are matched to each.

Stakeholder	Why them — and the focused ask
Sadik Al-Hassan MP	Grey belt misapplication is a national policy question only Parliament and ministers can fix, and the examination cannot receive correspondence from an MP — so the site-specific ask does not run here. Ask: raise the misapplication of footnote 7 with the department; ask what checks apply before undeveloped land beside an SSSI or ancient woodland can be classified as grey belt.
North Somerset Green Party (party channel)	The party has said it will not oppose individual allocations — but it shares the concern that national grey belt policy is being applied more widely than the public understanding of previously developed land, and its councillors are already pressing that point nationally. Ask: support on the national grey belt definition problem and, once live, the parliamentary petition — not site-specific opposition. Strictly separate from any NSC Cabinet role.
CPRE	The national evidence-holder on grey belt misuse. Ask: include Tower Farm in national evidence; support examination scrutiny.
Natural England / Avon Wildlife Trust / Woodland Trust	The statutory and expert voices for the footnote 7 assets themselves. Ask: formal representations at examination and application stage; appearance at hearings.
The Inspectors	Whether grey belt is soundly applied to this site is squarely an examination matter. Ask (via representations): test the footnote 7 exclusion and the granularity of the Green Belt assessment.

The historic record — this boundary was drawn to protect the wood

The historic record. The Green Belt boundary here was not drawn casually — and the campaign now holds the adopted plan that drew it. The South West Avon Green Belt Local Plan was formally adopted by Avon County Council on 29 December 1988. The committee record of 28 June 1988, the date the Inquiry Inspector’s Report was presented to committee, shows the Portishead Down land was added to the Green Belt on a site-by-site basis. The findings recorded that this is land ‘which should be retained open’, that the boundary protects the setting of the Gordano Valley and the town, and that a tighter boundary at the land off Weston Road was rejected as ‘detrimental to the sensitive nature of Weston Big Wood’. An inquiry-tested, site-specific judgement of this kind carries more weight than a desk-based comparative review.^{E24 E25 E26}

THE 1988 PLAN, IN ITS OWN WORDS

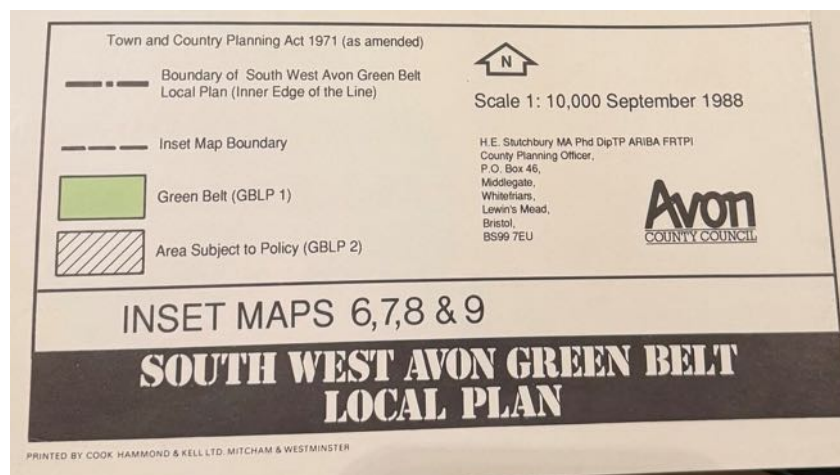
The boundary here was drawn to protect Weston Big Wood — not held for development

The adopted Written Statement justifies the Green Belt boundary segment covering Portishead, North Weston and Redcliff Bay by, among other factors, ‘protection of the setting and character of the Gordano Valley..., Weston Big Wood or Walton Down’ (Section 9). And unlike the boundary east of Portishead, this segment’s justification makes no ‘provision for possible future development’ — in the plan’s own reasoning, this land was protected, not held in reserve.^{E25}

The adopted policy is categorical: ‘Within those areas defined on the Proposals Map, development will not normally be permitted except in very special circumstances for purposes other than agriculture, forestry and outdoor recreation’ (Policy GBLP.2). The plan’s own words on permanence: ‘the essential characteristic of Green Belts is their permanence and their protection must be maintained as far as can be seen ahead’ (para 1.3); detailed boundaries in adopted plans ‘should be altered only exceptionally’ (para 4.2). That is precisely the standard NPPF paragraph 145 still applies today.^{E25}



Inset Map 6 of the South West Avon Green Belt Local Plan (September 1988, Avon County Council, 1:10,000). Portishead Down — where the Tower Farm allocation now sits — together with Weston Big Wood and Nightingale Valley, shown within the designated Green Belt (green). Crown copyright 1988; reproduced from the adopted statutory plan for the purposes of review and criticism of the planning record.



The plan's key and title sheet: 'South West Avon Green Belt Local Plan', Inset Maps 6-9, September 1988 — issued by Avon County Council's County Planning Officer. The solid green is 'Green Belt (GBLP 1)'.

The finding that has never been reversed. This is not the first time an inspector has considered whether land beside Weston Big Wood belongs in the Green Belt. At a public local inquiry in September 1987, a landowner argued for the release of land at Fore Hill, on the same open ground between the town and the wood. The Inspector refused, and his reasoning went to the wood itself: the landscape and open spaces near Weston Big Wood were “particularly sensitive”, and excluding the site from the Green Belt “would, in my opinion, allow development to be taken too close to the wood”. That finding was made on the planning merits, after evidence was tested at inquiry, about this wood. It has never been overturned.⁶²

What happened next, stated fairly. In June 1991 the Court of Appeal quashed part of the adopted Green Belt plan on that landowner's appeal. It is easy to read that as a developer defeating the Green Belt here, and it is not what happened: the court quashed on the adequacy of the reasons given, and the Master of the Rolls said in terms that the court was “not concerned with planning merits”. The Council recorded the same thing in its own words — it was “not the judgement of the Court nor a consequence of that judgement that the land is not suitable for designation as Green Belt”. Avon then did what the court invited: it reconsidered the boundary, set out its reasons properly, and put the land back through a formal Local Plan Alteration, deposited in December 1991 and taken to a second public inquiry in July 1992 — on grounds of landscape sensitivity, ecological value, the integrity of the Gordano Valley and the presence of Weston Big Wood. The land is in the Green Belt today. The 1993 report on that second

inquiry is not in the campaign’s hands and is being obtained, so this pack states the case the Council made and not the decision that followed it.^{E2}

Why it matters now. The Green Belt on this side of Portishead is not an old line carried forward without scrutiny. It was argued at inquiry, defended in court, and deliberately re-made — twice, in 1988 and again in the early 1990s — with the protection of this wood among the stated reasons. An assessment that rates this land’s Green Belt contribution from a desk, without engaging with an inspector’s contrary finding on the same ground, has a gap in it.

Portishead Town Council’s representations also point to a Secretary of State refusal of planning permission on this land; the campaign is obtaining the decision letter before relying on its date or detail.^{E24}

2.2 Weston Big Wood: an irreplaceable ancient woodland, already in decline

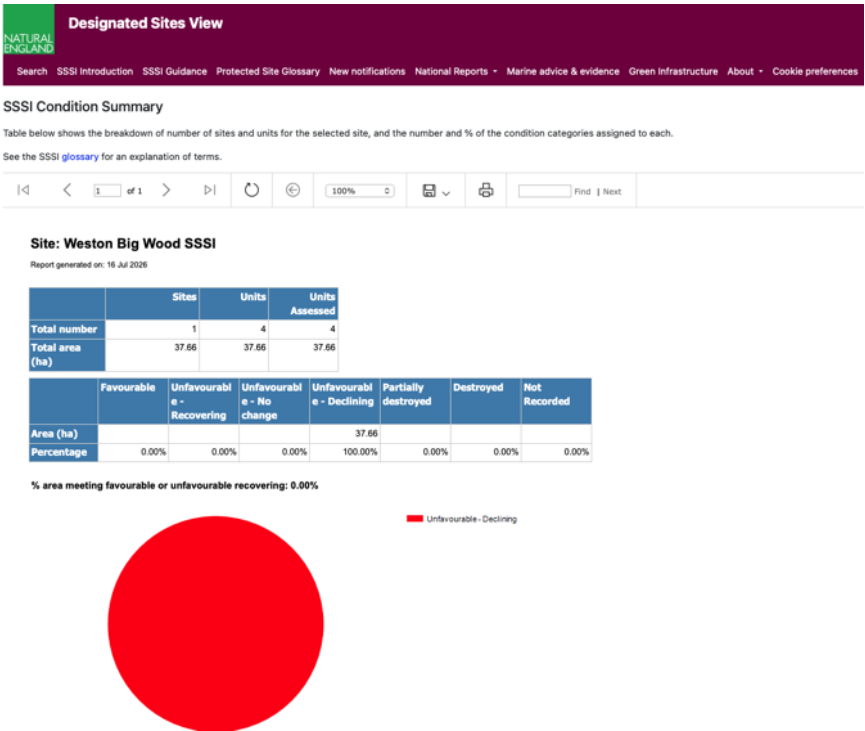
BOTH TRACKS

Weston Big Wood is a 37.66-hectare biological SSSI and ancient woodland, notified on 3 January 1984 and owned and managed by Avon Wildlife Trust. Published accounts describe woodland here at least since Iron Age times, with some evidence of continuity since trees recolonised after the last ice age.^{E3}

THE STATUTORY RECORD

Natural England’s own assessment: 100% ‘Unfavourable - Declining’

Natural England records all four units of the SSSI (37.66 ha) as 100% ‘Unfavourable - Declining’ (Condition Summary, generated 16 July 2026). Both recorded active pressures fall in the category ‘Disturbance and Recreational Impacts’. This is not the campaign’s claim — it is the statutory nature conservation body’s published record.^{E3}



Weston Big Wood SSSI Condition Summary — the whole of the site (37.66 ha, all four units) recorded as ‘Unfavourable - Declining’. Source: Natural England Designated Sites View, report generated 16 July 2026; reproduced unaltered.

The assessed decline, in Natural England’s own record

This is not a long-term or stable condition. Natural England’s own unit assessments show the whole wood being downgraded within the last few years — and its assessors name recreational pressure among the causes.

When	Natural England’s assessed condition of the woodland
3 January 1984	Weston Big Wood notified as a Site of Special Scientific Interest under the Wildlife and Countryside Act 1981.

When	Natural England's assessed condition of the woodland
1998–2010	Natural England's monitoring visits across 1998–2010 record the wood in favourable condition at every visit — a stable, long-established baseline.
July–August 2022	Assessment field visits to the units (Unit 1 on 15 July, Unit 3 on 23 August). Recreational-disturbance pressures recorded on the site in May and July 2022.
April 2023	All four units downgraded from favourable to 'Unfavourable – Declining' (units assessed 5 and 12 April 2023). Natural England's causes: ash dieback and honey fungus, with recreational pressure — soil compaction from visitors and dogs off-lead, and mountain-bike damage — recorded as adding to the stress and 'likely exacerbating the impacts of ash die back'.
16 July 2026	Natural England's published record: 100% of the SSSI — all four units, 37.66 ha — 'Unfavourable – Declining'.

Source: Natural England, Designated Sites View — Weston Big Wood SSSI, unit condition assessments (units downgraded 5 and 12 April 2023; condition summary generated 16 July 2026). Read it at [designatedsites.naturalengland.org.uk \(unit condition\)](https://designatedsites.naturalengland.org.uk/unit-condition) — the unit-by-unit condition record for this site.

Why this matters here: Natural England has already identified recreational pressure as a factor pushing this wood downhill. Placing 400 households on its doorstep would add to precisely that pressure — the opposite of what a wood in this condition needs.



Inside Weston Big Wood, 20 July 2026: a broad, bare, compacted path worn through the woodland floor. Natural England's assessors record disturbance and recreational impacts — compaction from visitors and dogs off-lead, and mountain-bike damage — as active pressures 'likely exacerbating the impacts of ash die back'. Photograph by Portishead residents.

National policy is unambiguous: development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland, should be refused unless there are wholly exceptional reasons (NPPF paragraph 193). The emerging plan's own Policy DP35 states development harming an SSSI will not normally be permitted. A 50m buffer addresses edge effects; it does not address the deterioration mechanism Natural England has already identified — recreational disturbance — to which the scheme would add 400 households within walking distance.^{E8}

E17

The national target this wood is meant to count towards. The Government's commitment to protect 30% of land for nature by 2030 rests on protected sites. [Defra's 30by30 Delivery Plan for England](#) states: 'Our protected sites – made up mostly of SSSIs – form the backbone of delivery for 30by30 on land'. The test is not designation but condition: an SSSI counts towards the target only where its features are in favourable condition, or unfavourable but recovering. Weston Big Wood is recorded as 100% Unfavourable – Declining, so at present it contributes nothing. On the published figures, protected sites supply 6.4 of the 7.1 percentage points currently counting. The statutory commitment alongside it is that 75% of SSSI features should be in favourable condition by 2042. This

wood therefore has to recover, not merely survive — and a development that adds recreational pressure to a site already declining works against a target the Government has set itself. ^{E3 E40}

THE CORRECTION THE COUNCIL STILL HAS TO MAKE

A formal examination document records that there are no SSSIs near Tower Farm

The Council's Regulation 22 Consultation Statement — the document in which it answers objections, served on the examination — states that there are no Sites of Special Scientific Interest in the vicinity of the Tower Farm allocation, and twice describes Weston Big Wood as “a local wildlife site” (p.308). Weston Big Wood is a Site of Special Scientific Interest, notified under the Wildlife and Countryside Act 1981, and it adjoins the allocation boundary. The Council's own evidence base says so in three places, and the same document says so elsewhere (pp.69, 178, 514, 515).

This is an error of record, not of motive. But it sits on the face of a document the Inspectors will read, and it concerns the single designation this case turns on. It needs correcting on the examination record.

One correction the Council will need to make. The four contradictions are set out below. Two details sharpen them: at p.510 the same document calls the wood the ‘Weston Big Wood SNCI’ — a third designation within one statement — and the representations it reproduces name the SSSI without correction (pp.69, 178, 514, 515). Residents' letters supporting the Green Belt here were citing the wood's SSSI status as long ago as 1991, on the record of the 1992 Green Belt Alteration. The campaign has raised the error with Natural England's plan-making team and is pursuing its correction on the examination record. ^{E35 E37 E39}

NORTH SOMERSET COUNCIL — Regulation 22 Consultation Statement (May 2026)

“There are no SSSIs in the vicinity of the Tower Farm housing allocation... a suitable ecological buffer is to be provided to Weston Big Wood, a local wildlife site...”

▲

CONTRADICTED BY FOUR INDEPENDENT SOURCES — TWO OF THEM THE COUNCIL'S OWN	
NATURAL ENGLAND	Its current published record: Weston Big Wood is a biological SSSI of 37.66 ha, notified on 3 January 1984 under the Wildlife and Countryside Act 1981.
THE COUNCIL'S OWN ARUP REPORT	Names two: “the Weston Big Wood SSSI and area of ancient woodland... as is part of the Weston-in-Gordano SSSI”.
THE COUNCIL'S OWN STAGE 2 ASSESSMENT	Describes the parcel itself as “bounded... partly by Weston Big Wood”.
THE SAME REGULATION 22 DOCUMENT	Elsewhere answers a different objection by referring to “Weston Big Wood, a SSSI” without dispute — so the document contradicts itself.

The Council's statement, and the four sources that contradict it. Sources: Natural England Designated Sites View; Arup Stage 1 Green Belt Assessment (30 October 2025); NSC Stage 2 Green Belt Assessment (October 2025); NSC Regulation 22 Consultation Statement (May 2026).

The examination has already shown what adequate treatment of recreational pressure looks like: for the Severn Estuary, the Council commissioned Footprint Ecology, completed visitor surveys, and is producing a funded mitigation strategy. Weston Big Wood — in worse recorded condition, closer to a larger allocation — has received no equivalent assessment at all. The submitted plan's own text makes the same point in miniature: Schedule 1's Tower Farm entry (CD6.4, pp.297–298), the only place the 365-page plan mentions Weston Big Wood, requires an ecological buffer to the wood but nowhere states that it is a Site of Special Scientific Interest — while the

Castlewood allocation names its SSSI expressly (p.264). An allocation cannot be soundly assessed against a designation the plan does not acknowledge.^{E10 E11}

THE STANDING ADVICE

Natural England and the Forestry Commission: buffers are floors, and compensation is no answer

[The two bodies' joint standing advice for planning decisions \(January 2022\)](#) is a material planning consideration in its own right. It sets a buffer of at least 15 metres from ancient woodland simply to avoid root damage — and requires larger buffers where other impacts extend further, expressly naming air pollution from development 'that results in a significant increase in traffic'. Its instruction is direct: 'You should not approve development proposals, including gardens, within a buffer zone.'^{E32}

It also closes off two arguments a developer might otherwise reach for. On compensation: because ancient woodland and veteran trees are irreplaceable, decision-makers 'should not consider proposed compensation measures as part of your assessment of the merits of the development proposal'. And on condition: a wood's poor state 'is not a reason to give permission for development' — it can be improved by good management. Natural England's 'Unfavourable – Declining' record is a reason for more protection, not less.^{E32}

For individual ancient or veteran trees — including on a woodland boundary — the advice sets a sharper standard still: a buffer of at least 15 times the tree's diameter, or 5 metres beyond its crown if that is larger. That is the standard against which any of the orchard's surviving fruit trees found to be veterans (section 2.7) would fall to be measured — on a boundary where PSL proposes no buffer at all.^{E32}

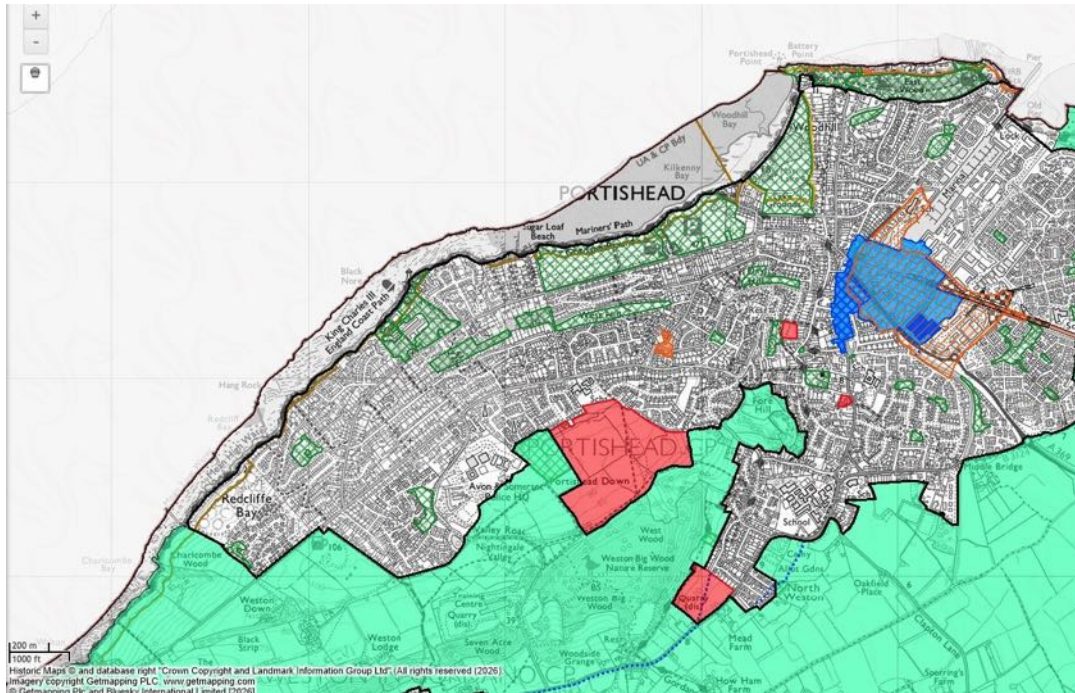
The made Neighbourhood Plan hardens that advice into development-plan policy. Policy PEN5 requires 'a minimum of 15m and preferably up to 50m buffer' to be maintained 'between any development and the Ancient Woodland of the SSSI Weston Big Wood, including during the construction phase' (made plan, pages 47–48) — naming this wood specifically, with the weight of the statutory development plan behind it.^{E9}

2.3 Closed in from both sides — the cumulative effect of Tower Farm and Black Rock

BOTH TRACKS

Tower Farm is not the only allocation beside this wood. On its far side the draft plan allocates Black Rock for around 100 homes under Policy SP7, carried in the site schedules as HE20124, 'Black Rock, North of Clevedon Road'. It is today a productive arable field, in maize through 2026, running along the woodland edge down to the main road. The disused quarry that gives the area its name lies alongside the allocation rather than within it: none of this land is previously developed. Taken together, some 500 new homes would close in on Weston Big Wood from both sides, and Portishead Town Council's formal representations object to both sites.^{E7}

Who is promoting it. The promoter and potential developer is Bloor Homes — Bloor Homes South West, the South West regional division of Bloor Homes Limited — which has promoted the land through the plan process with Aston & Co UK Ltd acting as its planning agents at the Preferred Options stage. Ownership is a separate question and the campaign does not assert it: no public source the campaign has read establishes who holds the freehold, and a promoter may act under an option rather than as owner. A search of the Council's planning register on 4 August 2026 returned no application for this allocation — the only records at the address are historic householder applications at the neighbouring Blackrock Villas. As at Tower Farm, the future of this land is being settled in the Local Plan now, not in a planning application later.^{E43}



The Council's own policies map. The two red parcels are the draft residential allocations — Tower Farm (up to 400 homes) on Portishead Down, and Black Rock (c.100 homes) beside the disused quarry — with Weston Big Wood Nature Reserve between them and the surrounding Green Belt in green. Source: North Somerset Council Local Plan policies map, reproduced with attribution for review and criticism of the planning record. Base mapping © Crown copyright and database right, Landmark Information Group, Getmapping PLC and Bluesky International Limited (2026).

The point is cumulative. A wood Natural England already records as declining, with both its recorded active pressures recreational, would gain new housing on both flanks at once — yet each allocation is assessed as if the other did not exist. The examination record shows what a proper assessment looks like (the Severn Estuary strategy above); for the combined pressure of some 500 homes around this wood, there is no equivalent. ^{E3 E10}



The Black Rock site today: a productive arable field running along the far edge of Weston Big Wood, allocated for around 100 homes. Photograph by Portishead residents, 20 July 2026.

THE DECISION THAT SHOULD TROUBLE ANYONE READING THIS

No Environmental Impact Assessment is required beside a declining SSSI

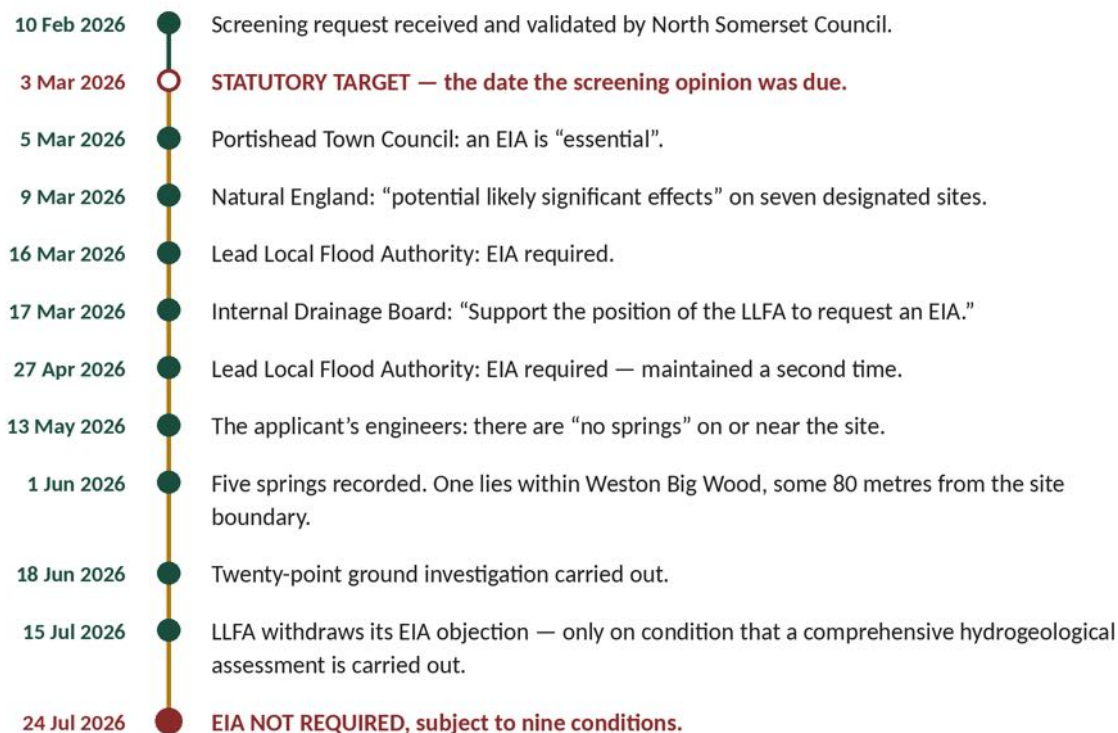
On 24 July 2026 North Somerset Council decided that up to 400 homes on Green Belt pasture immediately beside an ancient woodland and Site of Special Scientific Interest do not require an Environmental Impact Assessment — the one process that would have made the likely significant effects public, and independently scrutinised, before any decision was taken.

It decided that 143 days after the legal deadline for the decision. It decided it against its own Lead Local Flood Authority, which asked for an assessment twice; against the Internal Drainage Board; against Portishead Town Council; and against the developer's own ecologist, who could not rule out significant effects. Natural England had advised that there were potential likely significant effects on seven designated sites.

The consequence is simple. Without an assessment, no independent study of the effects on this wood will ever be published, and the questions the Council's own advisers raised go unanswered. That is why the campaign has complained, and why URGENT 2 at section 4.2 asks you to as well.

And no Environmental Impact Assessment is required. An EIA is the legal process by which the likely significant environmental effects of a major development are independently assessed and made public before any planning decision is taken. On 24 July 2026 North Somerset Council decided that Tower Farm does not require one (reference 26/P/0300/EA1). [The campaign holds the decision, the officer report and the full consultation record.](#)^{E33}

Statutory target 3 March 2026 · opinion issued 24 July 2026 · 143 days late



The screening decision, from request to opinion. The statutory target was 3 March 2026; the opinion issued on 24 July 2026, 143 days late. Source: the Council's own case file for 26/P/0300/EA1.

Who advised what — the Council's own record. This is not the campaign's summary of the consultation. It is what each consultee put in writing on the case file, which anyone can read on the planning portal.

Who	What they said on whether an EIA was required
Lead Local Flood Authority (the Council's own)	EIA required — recommended on 16 March, maintained on 27 April, and withdrawn on 15 July only on condition that a comprehensive hydrogeological assessment is carried out.
Internal Drainage Board	"Support the position of the LLFA to request an EIA." (17 March 2026)
Portishead Town Council	"Strongly believes that an EIA is essential." (5 March 2026)
Natural England	"Potential likely significant effects" on seven designated sites, and "further consideration is required" (9 March 2026). Natural England did not assess significance itself.
GE Consulting — the developer's own ecologist	"The prospect of the development constituting EIA development cannot be ruled out."
Exolum — operator of the oil pipeline crossing the site	Formal objection: "our High-Pressure Oil Pipeline Apparatus will be affected... we must therefore object."
The Council's Ecology Officer	EIA not required from an ecology perspective, subject to conditions — the view the decision principally rests on.
THE DECISION	EIA not required, subject to nine assessments. Issued 24 July 2026, 143 days past the 3 March target.

Consultee positions on the EIA screening for Tower Farm (26/P/0300/EA1). Source: the consultation responses on the Council's own case file.

Every consultee with a settled position pointed towards assessment, or could not exclude significant effects. The negative opinion rests on the Council's Ecology Officer's view and on the flood authority's conditional withdrawal — and that condition, a full hydrogeological assessment, has not yet been met. ^{E33 E41 E42}

The record shows the Council overruled the settled advice of its own advisers. Its own Lead Local Flood Authority recommended EIA twice; the Internal Drainage Board supported that call; Portishead Town Council said that an EIA was 'essential'; the applicant's own ecological consultant could not rule out significant effects on ecological receptors; and Exolum, the operator of the high-pressure oil pipeline crossing the site, has an unresolved formal objection on major-accident safety grounds. ^{E33}

The springs problem. The applicant's engineers first told the Council there were 'no springs' on or near the site. Three weeks later, after a meeting with the Council's flood team, they were obliged to address five — including one within Weston Big Wood, some 80 metres from the site boundary, in a drinking-water source protection zone. The flood authority lifted its EIA objection only on condition of groundwater monitoring sufficient to establish seasonal variation — implying at least twelve months — and that monitoring has not been done. ^{E33}

What Natural England said. The Government's own statutory adviser on nature was consulted, and on 9 March 2026 it replied that the proposed development "has potential likely significant effects on statutorily designated nature conservation sites or landscapes and further consideration is required". It listed seven of them, Weston Big Wood among them, alongside Nightingale Valley, Weston-in-Gordano and the Severn Estuary designations. Natural England was careful to add that it had not assessed the significance of those impacts itself, and advised the Council to consider further whether an assessment was needed. The Council concluded that it was not. ^{E41}

Nine assessments, and a checklist that flagged thirteen effects. The opinion is not a finding that the development is harmless. It requires, with any application, nine separate technical assessments: hydrogeological; archaeological desk-based with geophysical survey; landscape and visual impact; ecological assessment and surveys; biodiversity net gain; noise; transport and travel plan; arboricultural impact; and a Habitats Regulations Assessment. The officer's own screening checklist records that thirteen of its twenty-one questions indicate there could be an adverse effect. The conclusion is that all of them can be reduced below significance through mitigation and later assessment — that the development is "likely to have localised impacts only, which can be addressed through the planning application process". That is the judgement the campaign asks the Council to look at again. ^{E42}

And the cumulative effect was set aside on a technicality. The officer report addresses the 100 homes at Black Rock and the 785 at Wyndham Way, and discounts them from the cumulative assessment because they are allocated in an emerging plan and so are not "approved development". The difficulty is plain: the same emerging plan is the reason Tower Farm is being promoted at all. A neighbouring allocation cannot be too provisional to count as cumulative impact while being settled enough to justify the development beside it. ^{E42}

The decision itself arrived nearly five months past its statutory target, and its reasons do not adequately address cumulative effects with Black Rock, the sensitivity of the SSSI and ancient woodland, the outstanding groundwater work, or the unresolved pipeline objection. A formal complaint has been lodged with the Council through its corporate complaints process (reference NSC603122, 31 July 2026; a first-stage response is expected in late August), asking it to reconsider; the campaign is asking residents to add their own voices to that ask (section 4.2, URGENT 2 — template T2 at Appendix E).^{E33}

2.4 The wildlife corridor

BOTH TRACKS

The pasture at Tower Farm is not empty space between designations — it is the connective tissue. It links Weston Big Wood SSSI to Nightingale Valley SSSI and the Gordano Valley SSSI and National Nature Reserve. The 1988 Gordano Valley ecological study (Avon Wildlife Trust, WWF and the Nature Conservancy Council) and the 2023 Gordano Valley Ecological & Development Strategy Report (both published on portishead.gov.uk) document the corridor's function and show the case for protection has strengthened over four decades, not weakened.^{E5 E6}



The open pasture at Tower Farm meets the wooded edge of Weston Big Wood. It is this long-established grassland that links the wood to Nightingale Valley and the Gordano Valley. Photograph by Portishead residents, summer 2026.

Development across the 28.32 ha would sever the open-land buffer that allows species movement between these sites. Fragmentation of this kind reduces biodiversity and increases pressure on the remaining protected sites even with mitigation — and the made Portishead Neighbourhood Plan's Policy PEN2 protects precisely these ecological networks.^{E9}

THE COUNCIL'S OWN EVIDENCE

NSC's own assessments put horseshoe bats at the centre of this site

This is not the campaign's survey — it is the Council's own evidence base, obtained and checked against the original documents by the campaign in July 2026.

The Habitat Evaluation Procedure report prepared for the Council (Avondale Ecology, October 2025) assesses Tower Farm as Band B for greater and lesser horseshoe bats — suitable habitat, within the new bat consultation zones, providing functionally linked foraging habitat for the protected bat population.^{E27}

The Habitats Regulations Assessment (AECOM, October 2025) finds Tower Farm 'has the potential to have an adverse impact on functionally linked land' for the Special Area of Conservation — with the proposed mitigation resting on Nature Parks at Nailsea/Backwell and Wolvershill/Banwell, not in Portishead. And the two documents appear to differ on the scale of off-site compensation required — approximately 9 hectares in one, approximately half a hectare in the other — a discrepancy the Inspectors can fairly be asked to resolve.^{E28}

The mitigation is in the wrong place. Look at where the Council's own assessment proposes to compensate for the loss. The Nature Parks it relies on are at Nailsea and Backwell, and at Wolvershill and Banwell — the far side of the district, ten miles and more from this land. Nothing is proposed in Portishead at all. Functionally linked land is not interchangeable: it is the specific foraging ground that supports a specific population, and a nature park in another town does not feed a horseshoe bat that forages here. Nor is the scale settled — the Council's own two documents differ by a factor of roughly eighteen on how much compensatory habitat is needed. An allocation whose ecological mitigation is neither in the right place nor agreed in extent is not, on the face of the evidence, an effective one.^{E27 E28}

Before any permission could be implemented, Natural England would need to grant a mitigation licence — and can only do so if there is no satisfactory alternative, the development serves imperative reasons of overriding public interest, and the species' favourable conservation status is maintained. Beside an ancient woodland SSSI, with the Council's own evidence recording the site's value to SAC bats, that three-part test is exceptionally difficult to satisfy. Housing with identified reasonable alternatives (see section 3) struggles on the first limb alone.

THE STATUTORY VOICE

Why Natural England must be involved

Natural England is the Government's statutory adviser on nature. It is the body that notified Weston Big Wood as an SSSI, that records its condition, and that must license any works affecting European Protected Species such as bats. Its view carries weight an objector's cannot.

Its involvement here is not optional. The site falls within the SSSI's Impact Risk Zone — the mapped area around a designated site within which the planning authority is required to consult Natural England on development of this kind. So Natural England has a formal role at the application stage by law, and can make representations at the Local Plan examination now.^{E4}

The campaign is asking Natural England to put its own assessment — the SSSI's 'Unfavourable – Declining' condition and the recreational-disturbance pressure — formally before the Inspectors and, in due course, the case officer. Members of the public can reinforce that by drawing Natural England's attention to the site (contact: designated sites system, gov.uk). Its evidence, not residents' concern, is what an Inspector will weigh most heavily.

2.6 Red-listed birds — in both habitats, and absent from the developer's evidence

BOTH TRACKS

The Birds of Conservation Concern Red List (2021) names the UK's 70 most threatened bird species. Independent, dated, attributable public records show Red List species using both habitats this allocation affects — the wood and the pasture — while the developer's own ecology material names no bird species at all and commits only to surveys 'to be undertaken'.^{E1 E30}

THE RECORDED ASSEMBLAGE



Wildlife recorded in and around Weston Big Wood: a red admiral on the trunk of a woodland tree, a buzzard in the canopy, and a roe deer on the pasture. Photographs by Bob Cartwright, a local photographer, used with permission. These are not the Red List species discussed below — they are simply what an ordinary week in this wood looks like.

Nine Red List species at the wood — and a farmland assemblage on the pasture

[Weston Big Wood's public eBird record](#) lists 52 species, nine of them Red List — each record carrying a date, a count and a named observer. Seven have records from 2023 onwards, five from 2026 alone: Marsh Tit (May 2026), Greenfinch (May 2026), Mistle Thrush (March 2026), Herring Gull (May 2026), House Sparrow (May 2026), with Linnet and Starling (2023), and Woodcock (2010) and House Martin (2007) as older, genuine records. The Linnet is no one-off: the site's aggregated records show a recurring February–June presence — corroborating, with dates, Portishead Town Council's own point that the expanding woodland fringe supports it.^{E30}

On the pasture itself, the regional records centre's data — with its Lapwing and Skylark records re-verified in July 2026 against the live international archive — shows a distinct farmland assemblage: wintering Lapwing in flocks of up to 350 birds, and Skylark records spanning 2001–2005. Records of further Red List farmland species on the square (Grey Partridge, Yellow Wagtail, Whinchat, Tree Pipit) are being individually re-verified before formal use — the campaign cites only what it has checked.^{E31}

These are citizen-science and records-centre data: they establish presence and habitat function, not abundance, and this pack says so plainly. But they are more than the allocation's evidence base offers — which contains no bird survey at all. And the records split across seasonal windows: winter Woodcock and thrushes; spring-and-summer Linnet, Greenfinch and House Sparrow. A single-visit or single-season walkover — common practice for outline schemes — would structurally miss much of this assemblage. The Inspectors can fairly be asked why land was allocated before anyone checked.^{E30}

E31

The made Neighbourhood Plan gives this a policy edge: Policy PEN4 provides that development which could harm species identified as Species of Principal Importance 'will not be permitted unless the harm can be avoided or mitigated by appropriate measures' (made plan, page 42). Without a bird survey, no one can say the harm is avoided or mitigated.^{E9}

2.7 The developer's 50-metre buffer, answered — and the orchard

BOTH TRACKS

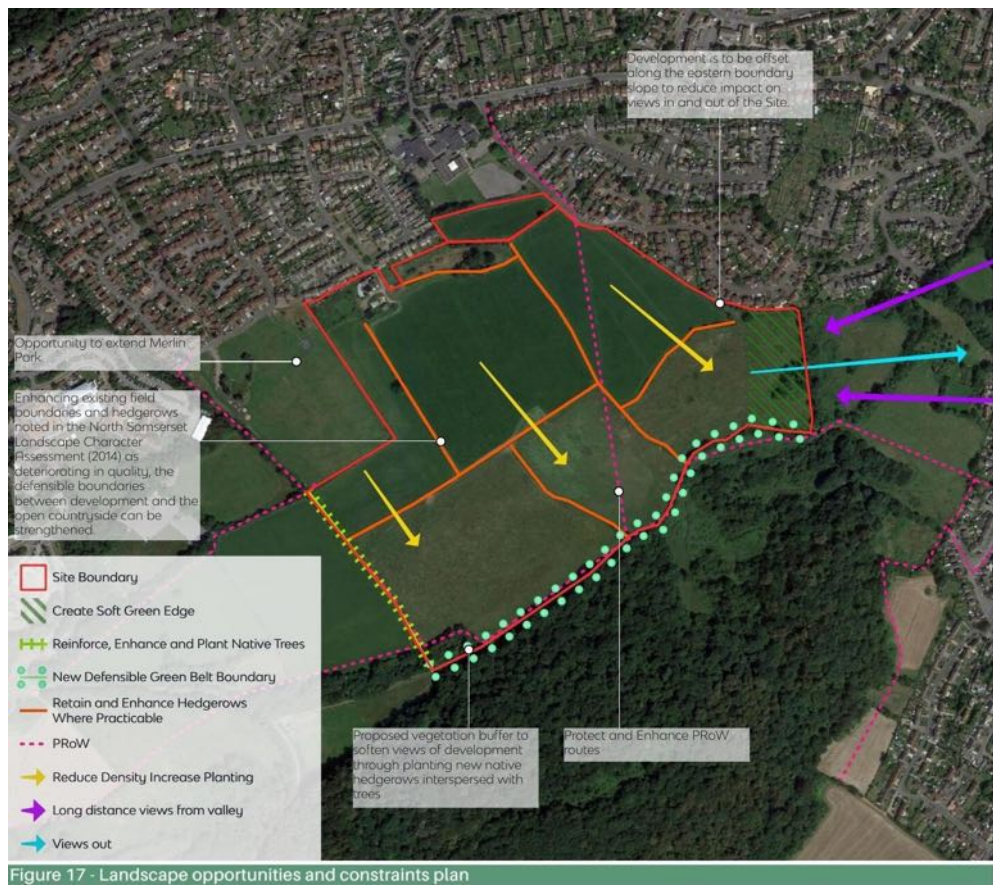


Figure 17 — Landscape opportunities and constraints. Source: PSL Vision Document (April 2022), reproduced unaltered for review and criticism. The promoter's own plan marks long-distance views from the valley and a proposed defensible Green Belt boundary against the wood.



Figure 18 — Ecological opportunities and constraints. Source: PSL Vision Document (April 2022), reproduced unaltered for review and criticism. The promoter's own plan shows the 15m and 50m ancient-woodland buffers and the Weston Big Wood SSSI/SNCI land immediately adjoining.

WHAT THE DEVELOPER SAYS	WHAT THE EVIDENCE SHOWS
'There will be no development within a 50m buffer of the existing woodland, going beyond the current legislation of 15m.' Green corridors, hedgerow retention and 10% biodiversity net gain will protect and enhance habitats; the SNCI grassland is retained as open space.^{E1}	Natural England's published condition assessment already records Weston Big Wood SSSI as 100% 'Unfavourable - Declining', and both recorded active pressures on the site are recreational-disturbance impacts — before a single new home is built.^{E3} A buffer manages edge effects. It does nothing about 400 households' worth of new recreational pressure on a wood already in documented decline from exactly that kind of pressure, and nothing about severance of the corridor linking Weston Big Wood to Nightingale Valley and the Gordano Valley SSSIs.^{E3 E6} Ancient woodland is irreplaceable and exempt from biodiversity net gain offsetting — a 10% BNG figure cannot compensate for harm to it (NPPF paragraph 193; Environment Act 2021). Bats recorded in the area are European Protected Species; harming them or their roosts is a criminal offence regardless of any planning permission.^{E8 E16} Elsewhere in this very examination, the Council's own standard for recreational pressure on a designated site is commissioned specialists, empirical visitor surveys and a funded mitigation strategy with a timetable (Severn Estuary, PS1 answer 1). No equivalent exists for Weston Big Wood.^{E10}

The northern boundary, and what stands on it. PSL's own Vision Document creates a green wedge along the eastern boundary, in its own words 'protecting the amenity of existing properties of The Downs' — but is silent on the northern boundary, where remnant fruit trees stand among mature hedgerows, deadwood, scrub and rough grassland under a cattle-grazing regime: a functioning habitat mosaic connected to the adjacent SSSI. The area is recorded on the national Priority Habitat Inventory as a traditional orchard (reference NSOM1048).

There are two such records here, not one: NSOM1047 and NSOM1048, mapped as separate parcels along the same northern edge. The campaign walked and photographed the boundary on 25 July 2026. What a full ecological survey would make of the trees — their number, their age, whether any meet the criteria for veteran status — is precisely the assessment the developer's published material does not provide. Nothing in it identifies the inventory records, the trees, the hedgerows or the mosaic at all.

The made Neighbourhood Plan remains squarely relevant: Policy PEN5 requires ancient or veteran trees to be retained within development sites, with root protection areas — and the national standing advice sets the buffer for a veteran tree at fifteen times its diameter, or five metres beyond its crown if larger (section 2.2). PSL has been asked, on the record, to extend a buffer to the northern boundary equivalent to the one its own plan gives the east.

E1 E9 E29 E32



The remnant orchard on the site's northern boundary, photographed during the campaign's site visit of 25 July 2026 — fruit trees standing in the rough grassland, scrub and mature hedgerows of the wider habitat mosaic. Photograph by Portishead residents, 25 July 2026.



The two traditional orchard records on the national Priority Habitat Inventory at the site's northern boundary, NSOM1047 and NSOM1048, shown against the field pattern and the school playing field beyond. Source: MAGIC (Defra) Priority Habitat Inventory. © Natural England and Defra; contains Ordnance Survey data © Crown copyright and database right.

The stronger ground is the hedgerows — and the mosaic as a whole. Three strands of the case stand whatever a survey of the trees ultimately finds — and none of them depends on the inventory entry.

First, the hedgerows are a priority habitat in their own right: Portishead Town Council's screening response records approximately a mile of hedgerows on the site, most of them internal — and most of them would be lost to the proposed layout, a loss that biodiversity net gain rules require to be compensated.

Second, veteran status is a test applied to each tree individually, not to the group: a single tree qualifies on any one of three features — decay features, a large girth for its species and setting, or high nature value (Biodiversity Gain

Requirements (Irreplaceable Habitat) Regulations 2024) — and a specialist assessment of the surviving trees is being sought.

Third, the Environment Act 2021 (Schedule 7A) requires the biodiversity baseline for a development to be measured against a site’s pre-degradation value where habitat has been lost since 30 January 2020 — whether this orchard held more trees at that date is a live question the campaign is pursuing through historic imagery and records, and is stated here as an open inquiry, not a settled fact.^{E29 E33}

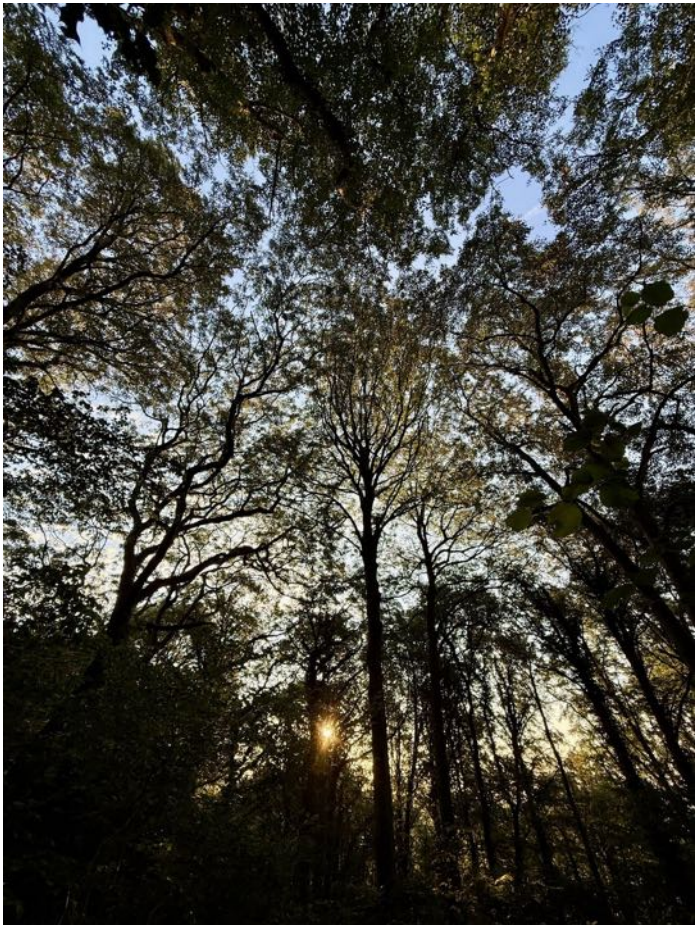
2.8 Three more environmental locks

BOTH TRACKS

The developer’s own openness concession. The Tyler Grange assessment does not rate the site low-harm against Green Belt purpose (c) — safeguarding the countryside from encroachment — and concedes visibility and openness harm across the Gordano Valley.^{E1}

The hedgerow network. Portishead Town Council’s screening response records approximately a mile of hedgerows on the site, most of them internal, and most of them lost to the layout the promoter has illustrated. Hedgerows are a priority habitat in their own right, and emerging Policies DP38 and DP40 require development to retain and protect them. The plan’s own allocation schedule requires field boundaries and hedgerows to be retained at Hutton, Downside and Wolverhill. It requires nothing of the kind at Tower Farm.^{E23 E33}

Neighbourhood Plan Policies PEN2 and PEN4. The made Portishead Neighbourhood Plan (19 September 2023) protects the green infrastructure network under Policy PEN2, and biodiversity and Species of Principal Importance under Policy PEN4. The Council’s own PS1 confirms the Neighbourhood Plan contains no housing allocations — the community’s plan did not choose this. An Inspector overriding a made plan’s environmental policy must give sound reasons for doing so.^{E9 E10}



The canopy of Weston Big Wood at dawn. Everything in section 2 is about whether this wood recovers or declines. Photograph by Portishead residents, 3 August 2026.

3 The strategic arguments

Second in the telling, not in strength. Access, sounder alternatives, deliverability and the developer's own conduct — the practical tests an allocation must survive. The access argument alone remains capable of justifying refusal.

3.1 A single access beside two schools

BOTH TRACKS

Every vehicle serving up to 400 homes would enter and leave through The Downs — a residential cul-de-sac network immediately beside High Down Infant and Junior Schools, already documented as congested and hazardous at school-run times. The developer's own material confirms the Tower Road access is for emergency, pedestrian and cycle use only.^{E1}

NPPF paragraphs 110–115 provide that development should be refused where there is an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network are severe. Even modest traffic increases matter where a network is already at capacity; this increase is not modest, and the network is a school-adjacent cul-de-sac. Portishead Town Council's formal examination response puts the traffic from 400 new homes at 'approx. 548 additional cars' — its stated estimate of additional vehicles, each making several trips a day, on a school-adjacent network.^{E7 E8}

A COMPETITOR'S ADMISSION

Persimmon Homes formally answered 'No' to this site

[In its representation to the Regulation 19 Additional Sites Consultation](#) (21 March 2025, Comment ID 31975457//1), Persimmon Homes Severn Valley answered 'No' to whether Tower Farm is suitable for housing development, on three grounds:

Transport — development would generate 'significant vehicular traffic flows through the centre of Portishead' then up to the site, described as unnecessary and inconvenient; land near the strategic road network and planned station is more sustainable. Landscape — the elevated, prominent topography means development would be obtrusive and present significant landscape harm.

Ecology — the site 'directly adjoins the Weston Big Wood SSSI', requiring careful assessment of impacts on its ecological function.

Persimmon is a national housebuilder actively promoting a competing Portishead site. The point is not that it is neutral — it is that even a developer seeking Portishead housing land, with every incentive to normalise Green Belt release, could not endorse this one. The representation was on record before the Council allocated the site in June 2025.^{E14}

The Council's answer to the Inspectors on transport (PS1, answer 11) resolves motorway-junction mitigation at strategic level. It says nothing about the local network. The site-specific access failure at Tower Farm is untouched by that resolution — it is a separate, unanswered problem.^{E10}

3.2 The developer’s transport claims, answered

BOTH TRACKS

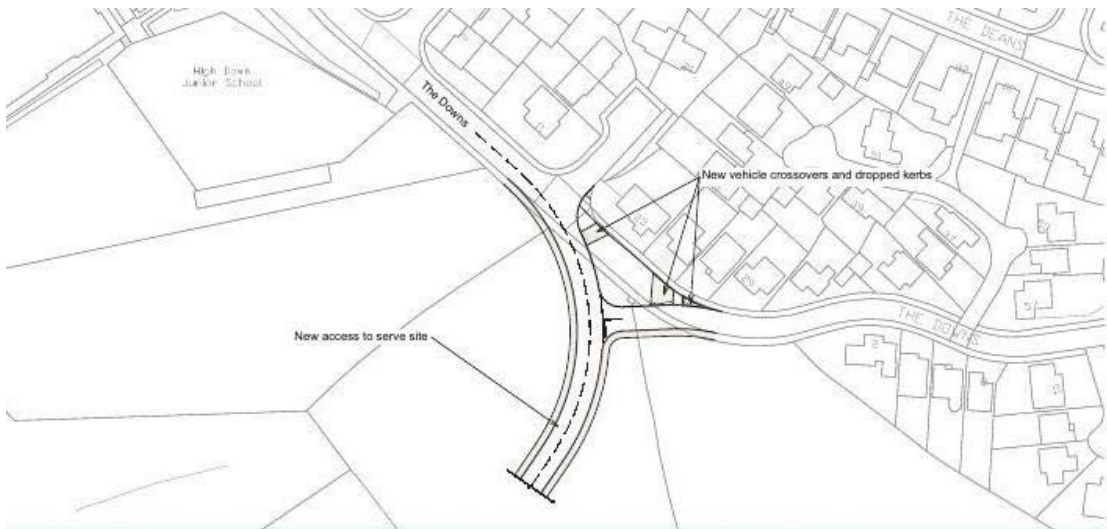


Figure 25 - Main Site Vehicular Access - The Downs

Figure 25 — Main Site Vehicular Access, The Downs. Source: PSL Vision Document (April 2022), reproduced unaltered for review and criticism. The promoter’s own drawing confirms a single new access serving the site off The Downs.

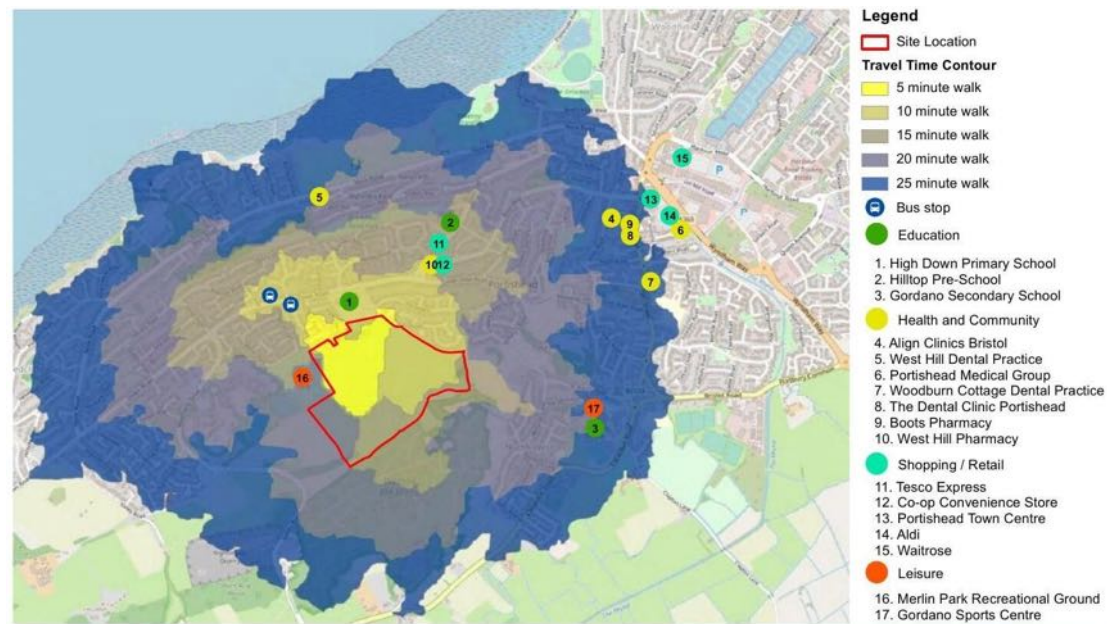


Figure 24 - Pedestrian isochrone and Local Facilities

Figure 24 — Pedestrian isochrone and local facilities. Source: PSL Vision Document (April 2022), reproduced unaltered for review and criticism. The promoter’s own walking-time contours and the facilities counted within them.

WHAT THE DEVELOPER SAYS	WHAT THE EVIDENCE SHOWS
'Walking accessibility of the Site is deemed good' with facilities 'within reasonable walk distance'; e-bikes 'could address the existing barriers to cycling'; a 'mobility hub' and school drop-off would manage traffic.^{E1}	The sole functioning vehicular access for up to 400 homes is The Downs — a residential cul-de-sac network directly beside High Down Infant and Junior Schools, already congested at drop-off and pick-up. PSL's own material confirms Tower Road access is emergency, pedestrian and cycle only.^{E1} Their own transport work concedes the point: 'the steep topography and lack of local cycle infrastructure could be a barrier to cycling' — the mitigation offered is e-bikes.^{E1} No bus can access the site; the shuttle bus to the future rail station is, in PSL's own words, a 'bespoke shuttle bus service' — proposed, with no funding or delivery mechanism identified. Portishead Town Council's examination response puts the traffic from 400 new homes at 'approx. 548 additional cars' — additional vehicles on this network, before counting the several trips each makes in a day.^{E1 E7}

3.3 Why the allocation fails the soundness tests

EXAMINATION TRACK

Ground	The argument in brief
Prematurity	Application track. The plan is at examination and not yet adopted; the Tower Farm allocation carries only limited weight as emerging, unresolved policy (NPPF paragraph 48). Granting planning permission before the Inspectors rule on whether the allocation is sound would prejudice the outcome of that examination.
Not justified — alternatives not exhausted	PTC's representations identify evidenced alternatives the Council did not properly assess: Castlewood, Clevedon (council-owned, and identified in PTC's representations as capable of substantially more than its allocation); the Wyndham Way uplift from 485 to 785 homes (proving brownfield capacity was under-assessed); omitted deliverable sites. The Council's own PS1 data shows small-site and windfall supply performing strongly (16% of capacity claimed on sub-hectare sites). The sequential approach was not exhausted before Green Belt release.
Not effective — not deliverable	Pipeline easement; unconfirmed PRow diversions; SNCI constraint; school and Merlin Park offers dependent on third-party land; no published viability. Contrast the Council's own Nailsea/Backwell evidence (PS1 answer 8): feasibility, design, business case, land control, dependency analysis. Tower Farm meets none of that standard.
Golden Rules not met	For a grey belt development to be acceptable in principle, the NPPF (paragraphs 156–157) requires 'Golden Rules' to be satisfied — a minimum level of affordable housing, local infrastructure and accessible green space, each of which must be secured in a legal agreement, not merely promised. The affordable housing commitment is unsecured; the infrastructure offers depend on third-party land; the green space offer assumes land PSL does not control. The Council's own monitoring framework (PS1a) now commits to reporting Golden Rules compliance — a standard this allocation cannot currently meet.
Unsustainable location	Steep topography (developer-conceded), no bus access, unfunded shuttle. The sustainable transport case rests on e-bikes and aspiration.

3.4 The Council’s own brownfield alternative — Wyndham Way

EXAMINATION TRACK

North Somerset Council has its own plan for new homes on brownfield land in the centre of Portishead. In 2022 it published a masterplan for the Wyndham Way area, prepared with Portishead Town Council and a major landowner in the area, and put out to public consultation. It covers the land between the High Street, the Marina and the route of the new railway station. The Local Plan as submitted describes Wyndham Way as a broad location ‘capable of accommodating up to 785 new dwellings over the plan period’. ^{E22 E23}

That figure started at 485. It rose to 785 after Portishead Town Council pressed for a proper assessment of density. The Council’s own process shows that brownfield land holds more homes when it is properly assessed. ^{E23}

THE SEQUENCING PROBLEM

Green Belt released while brownfield capacity sits unused

National policy (NPPF paragraph 147) requires a council to show it has made as much use as possible of brownfield land, and optimised densities, before it alters Green Belt boundaries. The Council’s own material identifies up to 785 homes on central brownfield land next to the funded railway.

The plan proposes 24,495 homes against a requirement of 23,700. It would meet its requirement without Tower Farm’s roughly 400. Releasing Green Belt here was a choice, and no published evidence explains that choice. This is hearing-statement material for the examination’s ‘justified’ test.

ENGAGE THE COUNTER-ARGUMENT

The counter-argument — and why it does not rescue the allocation

The Council and the developer will say Wyndham Way is a longer-term ‘broad location’ that cannot deliver homes early in the plan period, and a rival developer has already attacked its deliverability on the record. Two answers. First, that critique comes from a company promoting its own greenfield site on the edge of Portishead: treat it exactly as this pack treats the same company’s objection to Tower Farm. Second, the Council has published detailed feasibility and funding evidence for other schemes it wants to bring forward (see the Nailsea/Backwell comparison above), but nothing comparable to justify holding its town-centre brownfield programme back while bringing Green Belt forward.

3.5 Promised benefits and deliverability

BOTH TRACKS

WHAT THE DEVELOPER SAYS	WHAT THE EVIDENCE SHOWS
A dedicated school drop-off and pick-up area ‘within our land’; potential school expansion; extended sports pitches, a multi-use games area and upgraded play at Merlin Park; new allotments; long-term protection for the wood. ^{E1}	The school expansion depends on the Education Authority agreeing to use its land — a third party’s decision, not PSL’s to promise. The Merlin Park proposals assume changes to public land PSL does not own. Neither is secured.^{E1} Public rights of way cross the site; diversion requires a separate statutory process under the Highways Act 1980 and is not guaranteed. The Exolum oil pipeline easement crosses the site. The eastern SNCI grassland constrains the developable area. No viability appraisal has been published.^{E1} The comparison that matters: for the Nailsea and Backwell allocation, the Council has put before the Inspectors a full feasibility trail, preliminary engineering designs, a Homes England business case, confirmed land control and a dependency analysis stating exactly how much housing can proceed and when the infrastructure is needed. That is what a deliverable allocation looks like at examination. Tower Farm has no equivalent for any of its dependent infrastructure.^{E10}

3.6 How the developer has engaged

APPLICATION TRACK

The made Neighbourhood Plan includes a Pre-Application Community Engagement Protocol (Appendix 2 of that plan), asking developers to make contact with the Town Council ‘at the very start of any process’ — because ‘consulting people late with already prepared schemes is not productive’ — and to report, with any application, on how community engagement shaped the scheme.^{E9}

Portishead Town Council’s experience of this site sits a long way from that standard. The Town Council records first contact from the site’s promoters only around the start of 2026 — nearly four years after promotion began with the April 2022 Vision Document — and it had to establish for itself who was behind the scheme. The campaign is confirming the precise date from council records. If an application comes, the developer’s account of its community engagement will be tested against this record.^{E1 E34}

YOU ARE NOT ALONE

Who objects, and who has raised concerns — the public record

This is not a lone campaign. In the Additional Sites consultation, 196 of the 210 people who commented on Tower Farm (93%) said the site was not suitable for housing.^{E21}

Avon Wildlife Trust, which owns and manages the wood itself, formally objected: ‘Once damaged they cannot be restored.’ The Environment Agency placed on record that the site sits on a Principal Aquifer, adding groundwater and pollution-pathway concerns. Portbury Parish Council objected on ecological grounds — ‘loss of ancient woodland cannot be mitigated for’ — a second parish council alongside Portishead Town Council. And Persimmon Homes, a national housebuilder promoting a rival Portishead site, answered ‘No’ to this one.^{E7 E14 E18 E19 E20}

4 Actions — what you can do

The campaign’s aim right now is one thing: persuade the independent Inspectors to remove Tower Farm and Black Rock from the Local Plan. The action plan is in three bands. **URGENT**: three things everyone is asked to do — email your ward councillors, complain to North Somerset Council about its EIA screening decision, and sign the community petition. **IMPORTANT**: four more that add real weight if you can. **RESERVE**: two held back in case the sites are not removed. The three urgent actions take under twenty minutes, from home, and everything you need is in this pack.

4.1 The decision that matters now

	Examination track — LIVE NOW	Application track — later, if at all
What is being decided	Whether the Tower Farm and Black Rock allocations are sound and stay in the Local Plan	Whether a specific planning application is approved or refused — no application exists today
Who decides	Independent Planning Inspectors	North Somerset Council (committee or officers)
Your route in	Anyone can follow the examination and sit in on the public hearings. People who sent written comments during the autumn 2025 Local Plan consultation have an extra right: when the Inspectors publish their question list (the ‘MIQs’), they can send written answers and ask to speak at the hearings	Nothing yet — there is no application. If one is submitted, objection letters and committee speaking rights follow; this pack will be updated
Timing	Hearings confirmed for the weeks of 9, 16 and 30 November and 7 December 2026, with a reserve week from 18 January 2027. Formal notice, with the Inspectors’ MIQs and Guidance Note, is due around 28 September	None. The Council expects the developer to apply later this year; alerts and residents’ channels will catch it if so
What carries weight	The four soundness tests and legal compliance	Material planning considerations (see section 4.3)

4.2 Your action plan — urgent, important, reserve

Three bands. The urgent actions are what the campaign asks of everyone — under twenty minutes altogether: the councillor emails, the EIA complaint, and the community petition. The important actions add real weight if you can, and the letter to the MP now sits among them: the examination cannot receive correspondence from an MP, but only Parliament can fix the national policy problem this case exposes. The reserve actions are held back and fire only if the sites are not removed. One further block follows the bands, for the High Down school community specifically. Every source behind these arguments is listed with its link at Appendix D.

Start here if you commented on the Local Plan in 2025. If you sent a written comment during the autumn 2025 Regulation 19 consultation, you hold a right nobody else does: when the Inspectors publish their Matters, Issues and Questions — expected late September — you can send written answers and ask to speak at the hearings. That right lapses if it is not used. Template T4 registers you with the Programme Officers and confirms you are recorded as a representor; do it now rather than in September. Everyone else: the actions below are open to all, and no 2025 comment is needed for any of them.^{E12}

	Action	Time	Start here
URGENT 1	Email your ward councillors: ask them to back removing both sites	5 min	Template T1; addresses in section 4.7

	Action	Time	Start here
URGENT 2	Complain to North Somerset Council about its EIA screening decision at Tower Farm	10 min	Template T2; why, in section 2.3
URGENT 3	Sign the community petition to the Government — and enter your postcode when prompted	2 min	c.org/jtSDcnf5nT — full detail in section 4.6
IMPORTANT 1	Write to the MP on the national grey belt problem	10 min	Template T3; why, in section 4.5
IMPORTANT 2	Send your local evidence to Portishead Town Council	10 min	How to, in section 4.2
IMPORTANT 3	Ask the Programme Officers to keep you informed	5 min	Template T4
IMPORTANT 4	Set up planning alerts — so nothing arrives unnoticed	5 min	n-somerset.gov.uk — steps below
RESERVE 1	If an application is ever submitted: object	30 min	Only when it is real — Template T5; how to, in section 4.3
RESERVE 2	Sign the parliamentary petition, once it opens	1 min	See section 4.6

URGENT 1 — Email your ward councillors (5 minutes, do it today)

Why: the Local Plan is the Council's plan, and the Council can propose changes to the Inspectors right up to the end of the examination — including deleting allocations. Your councillors are the members who can press for exactly that, and constituent emails are what move them. Every email now counts double: allocations are far harder to undo once the examination closes.

Do: copy template T1, personalise one or two lines, and send it to the councillors for your ward — all six addresses are in section 4.7 and at Appendix F, and every one is clickable. Ask them plainly: support the removal of Tower Farm and Black Rock from the Local Plan.

If you get stuck: not sure which ward you live in? Enter your postcode at [writetothem.com](https://www.writetothem.com) — it gives you your councillors (and your MP) with a message window built in, so you can send everything from there.

URGENT 2 — Complain to North Somerset Council about its EIA screening decision (10 minutes, do it this week)

Why: on 24 July 2026 North Somerset Council decided that no Environmental Impact Assessment is required at Tower Farm (reference 26/P/0300/EA1). The Council's own Lead Local Flood Authority recommended EIA twice; the Internal Drainage Board supported that call; Portishead Town Council advised that an EIA was 'essential'; the applicant's own ecologist said significant effects on ecological receptors 'cannot be ruled out'. The Council overruled all of them. On the hydrogeology, the applicant's engineers first said there were 'no springs'; three weeks later they were obliged to address five — including one within the SSSI, 80 metres from the site boundary — and the Council's flood team lifted its objection only on condition of groundwater monitoring sufficient to establish seasonal variation — implying at least twelve months. That monitoring has not been done. Volume of complaint is what shifts a screening decision: the more residents on the public case file, the harder it is for the Council to leave the opinion undisturbed, the stronger Portishead Town Council's institutional endorsement lands, and the stronger any subsequent request to the Secretary of State becomes. Every resident is entitled to complain — you do not need to have taken part in any previous consultation. Section 2.3 sets out the full picture.

Do: copy template T2, add a sentence in your own words at the marked place, and submit it through the Council's online complaints process — search 'complaints' at n-somerset.gov.uk and use the complaints form, quoting reference 26/P/0300/EA1, so your complaint gets its own tracked reference. If the form defeats you, email works just as well: send it to the case officer at Jason.Mak@n-somerset.gov.uk, copying the Director of Healthy and

Sustainable Communities at matt.lenny@n-somerset.gov.uk. Ask that your letter be treated as a formal complaint under the Council's corporate complaints procedure and placed on the public case file for 26/P/0300/EA1.

If you get stuck: one sentence in your own words is enough — why Weston Big Wood matters to you, or what you have seen change on the site. Personal, specific and local carries more weight than any legal argument copied from a template.

URGENT 3 — Sign the community petition to the Government (2 minutes, do it today)

Why: the campaign is taking the grey belt misapplication to the Government directly — a community petition urging the Prime Minister to intervene and see the Tower Farm and Black Rock allocations removed from the North Somerset Local Plan. Numbers are what make a petition credible, and the strength of local feeling it records is evidence the Inspectors, councillors and the MP all weigh.

Do: open c.org/jtSDcnf5nT, sign, and — this matters — **enter your postcode when the form asks for it**. That is how local support is counted and evidenced for Number 10; a signature without a postcode does not show us as local. Then send the link to three people who live locally and ask them to do the same.

If you get stuck: the link is a [Change.org](https://change.org) shortlink — safe to click, safe to share. If it does not open, the full address is change.org and the petition title is 'Save Weston Big Wood from development'.

IMPORTANT 1 — Write to the MP on the national grey belt problem (10 minutes)

Why: the examination is closed to him. The Programme Officers have confirmed that the Inspectors will not accept correspondence from anyone who did not make a Regulation 19 representation, and will not accept unsolicited correspondence even from those who did — so an MP has no route into this examination, and asking him for one wastes the ask. What an MP can do is national, and it outlasts Tower Farm: only Parliament and ministers can close the gap that let long-established pasture beside an SSSI be labelled 'grey belt' — and only they can stop that gap widening. The December 2025 draft of the revised NPPF proposes removing the footnote 7 exclusion altogether; opposing that removal is now the sharpest ask an MP can act on, and Mr Al-Hassan has already agreed in writing to raise footnote 7 with the Ministry.

Do: send template T3 to Sadik Al-Hassan MP (sadik.alhassan.mp@parliament.uk), asking him to raise the grey belt question with ministers and adding a sentence of your own. Include your full address and postcode — MPs normally act only for their own constituents.

If you get stuck: live outside his constituency? Find your own MP at writetothem.com and send the same letter — the grey belt problem is national, and any MP can raise it.

IMPORTANT 2 — Send your local evidence to Portishead Town Council (10 minutes)

Why: the Town Council made a Regulation 19 representation, so it has the right to be heard at the hearings. What it needs from residents is evidence: first-hand, dated, local observation is the one thing no consultant can generate. If you did not comment in the 2025 consultation, this is the most direct route your evidence has to the Inspectors.

Do: email your evidence to the campaign at savewestonbigwood@gmail.com — it is collated and routed to Portishead Town Council's Planning Advisory and Placemaking Group. Keep it to one page: what you see at school-run time on The Downs, how you use Weston Big Wood and what you have seen change there, wildlife you have recorded on the pasture with dates, and anything you know about the site's history. Say plainly that the Town Council may use your account in its examination material.

If you get stuck: dates and specifics are what count. 'Traffic is bad' carries nothing; 'on 14 May I queued for eleven minutes to get out of The Downs at 8.40am' carries a great deal.

IMPORTANT 3 — Ask the Programme Officers to keep you informed (5 minutes)

Why: the Local Plan examination decides whether Tower Farm stays allocated at all. Being on the notification list means you hear the formal hearing notice and the Inspectors' question list — due around 28 September, ahead of hearings in November and December — the day they publish.

Do: send template T4 to info@programmeofficers.co.uk. If you made a Regulation 19 representation, add the extra sentence in the template so your right to be heard is confirmed.

If you get stuck: didn't take part in the 2025 consultation? You can still attend the hearings as an observer, follow everything, and put your evidence in through your ward councillors and Portishead Town Council — those routes belong to everyone.

IMPORTANT 4 — Set up planning alerts (5 minutes) — so nothing arrives unnoticed

Why: there is no planning application today, and the campaign's focus is the examination. But the Council expects the developer to apply later this year, so five minutes now is worth it: an alert means nothing arrives unnoticed while attention is where it belongs. Set it, then forget it.

Do: go to n-somerset.gov.uk, search 'planning applications online', register with your email address, then save a search for 'The Downs, Portishead' or the Tower Farm area with email notifications on.

If you get stuck: the portal registration can be fiddly — if it defeats you, don't worry: Portishead Town Council and the residents' channels will announce any application the day it appears. The alert is belt and braces, not a front line.

IF THIS IS YOU — the High Down school community (15 minutes)

Why: the single access for up to 400 homes runs through The Downs, past High Down Infant and Junior Schools, at exactly the times children are arriving and leaving. Highway safety is a material consideration at application stage and an effectiveness question at examination — and the people who do that school run every day are the most credible witnesses there are. Section 4.7 sets this out; this is the action that goes with it.

Do: write in your own words to your ward councillors and the MP about what you actually see at drop-off and pick-up — the queue, the parking, the crossing points, the near-misses. Say that you are a parent, carer, governor or member of staff. Then ask your parent and friends association or the governing body whether it will write jointly: one letter from a governing body carries more than twenty individual ones.

If you get stuck: you do not need planning language. A description of a single morning, dated, is evidence.

The reserve band. The campaign's aim is that neither of these is ever needed: if the Inspectors remove both sites, the fight is won where it matters. If not, these two fire — and everything is pre-loaded.

RESERVE 1 — If an application is ever submitted: object (30 minutes, only when it is real)

Why it waits: there is nothing to object to today, and the campaign's aim is that there never will be — if the Inspectors remove both sites from the Local Plan, any application faces refusal on the development plan alone. If Parker Strategic Land does apply, every material objection must be weighed by the Council, and that will be the moment for this action — not before.

Do: nothing now. If your IMPORTANT 4 alert ever fires, or the residents' channels announce an application: open template T5, personalise it (especially what you see at school-run time), and submit it on the Council's planning register citing the application reference. Section 4.3 lists what carries weight — and what doesn't.

If you get stuck: everything is pre-loaded: T5 needs only the reference number and your own words. Keep this pack where you can find it.

RESERVE 2 — Sign the parliamentary petition (1 minute, once it opens)

Why: separate from the community petition at URGENT 3, a national parliamentary petition asks the Government to clarify how grey belt policy should apply to land adjoining SSSIs, ancient woodland and other nationally protected sites. 10,000 signatures earn a Government response; 100,000 mean it is considered for debate in Parliament.

Do: nothing yet. The petition was submitted on 28 July 2026 and is with the Petitions Committee for moderation on petition.parliament.uk. It cannot be signed publicly until the Committee approves it, and the live link will come through Portishead Town Council and the residents' channels the day it does.

If you get stuck: worried you'll miss the launch? Portishead Town Council and the residents' channels both keep you plugged in.

STUCK?

The three worries that stop people — and why they shouldn't

'I'm no good at formal writing.' You don't need to be. A short, personal, specific email — what you actually see at drop-off time, what the wood means to your family — carries more weight with decision-makers than polished boilerplate. The templates do the structure; you add two honest sentences.

'I didn't respond to the consultation last year.' It doesn't matter for almost everything here. Only the right to speak at the examination hearings depends on a 2025 representation — the MP letter, the EIA complaint, both petitions and the councillor emails are open to everyone, now.

'I only have ten minutes.' Then do URGENT 1 — the email to your ward councillors. Numbers are what move decision-makers, and yours might be the email that tips it.

Point your phone camera — the three quickest routes



writetothem.com — your MP and councillors from your postcode (URGENT 1, IMPORTANT 1)



The community petition — c.org/jtSDcnf5nT · enter your postcode when prompted (URGENT 3)



The Local Plan examination website — evidence, timetable, hearings (hwa.uk.com)

Already involved and want to go deeper? [The hearing sessions are confirmed for the weeks of 9, 16 and 30 November and 7 December 2026 \(reserve week 18 January 2027\)](#). Formal notice is due around 28 September, when the Inspectors publish their Matters, Issues and Questions and Guidance Note — those who made a Regulation 19 representation can then respond in writing and ask to be heard at the relevant session, with hearing statements due about two weeks before each session.

4.3 Writing words that count

Writing to councillors and the MP now: be specific and local (what you see at school-run time, what the wood means to your family — that is evidence); be accurate (overstatement discredits the case); one point per paragraph; and ask in terms: support the removal of Tower Farm and Black Rock from the Local Plan. A short, personal, honest email beats polished boilerplate every time.

The arguments that carry weight at the examination: the soundness tests — whether each allocation is justified against reasonable alternatives (the Council's own brownfield programme, section 3.4), effective (deliverable access, infrastructure and benefits), and consistent with national policy (footnote 7, irreplaceable habitats, Green Belt release rules). The evidence in sections 2 and 3 of this pack maps onto exactly those tests.

For later — if an application is ever submitted, objections turn on 'material planning considerations': highway safety and access adequacy; harm to the SSSI, ancient woodland and protected species; conflict with the development plan and the NPPF; Green Belt harm; deliverability failures; cumulative impact. What carries no weight: loss of a private view; property values; the developer's identity or motives. Template T5 is pre-loaded for that moment; leave it parked until the moment is real.

4.4 Timeline and key contacts

The full campaign timeline is at Appendix C. The contacts you are most likely to need:

Who	Contact
Programme Officers (examination)	info@programmeofficers.co.uk — Helen Wilson 01432 639547; Yvonne Parker 01282 450522

Who	Contact
NSC planning portal (precaution only — no application exists)	n-somerset.gov.uk — email alerts, so any future application is spotted at once
Portishead Town Council	Formal campaign coordination via the Planning Advisory and Placemaking Group — savewestonbigwood@gmail.com
Sadik Al-Hassan MP	sadik.alhassan.mp@parliament.uk
Avon Wildlife Trust	Owner and manager of Weston Big Wood — avonwildlifetrust.org.uk

4.5 The role of your MP

An MP does not decide the Local Plan — the independent Inspectors do, and any future planning application would be for North Somerset Council. The examination's own procedure narrows it further: the Programme Officers have confirmed that the Inspectors will not accept correspondence from anyone who did not make a Regulation 19 representation, and will not accept unsolicited correspondence even from those who did. An MP therefore has no route into this examination, and the campaign does not ask him for one. What an MP does have is the national route, and it is the more durable of the two: only Parliament and ministers can change the policy that lets fields of long-established pasture beside a nationally important wildlife site be labelled 'grey belt'.

Sadik Al-Hassan MP, who covers Portishead, has agreed in writing to raise the misapplication of NPPF footnote 7 with the Ministry of Housing, Communities and Local Government, and is considering supporting a parliamentary debate on strengthening that protection. That is a real commitment, and the campaign is grateful for it. What matters now is that it is acted on — and that is the single most useful thing residents can ask him for. What an MP can usefully do is all national: oppose the removal of the footnote 7 exclusion proposed in the December 2025 draft of the revised NPPF; raise the grey belt question with the Ministry of Housing, Communities and Local Government; ask what checks apply before undeveloped land beside an SSSI or ancient woodland can be classified as grey belt; table parliamentary questions; write to the Secretary of State; and support a debate on strengthening that protection. Locally, the routes that carry weight are your ward councillors, Portishead Town Council, and — for those who commented in 2025 — the examination itself.

WHAT TO ASK YOUR MP FOR

He has agreed to raise it. Please ask him to do it — and to say what happened

Ask him to confirm, in writing, that he has now put the footnote 7 question to the Ministry of Housing, Communities and Local Government, and to tell you what answer he received.

Ask him to oppose the removal of the footnote 7 exclusion from the grey belt definition in the revised National Planning Policy Framework, which the Government consulted on and has not yet finalised. This is the key safeguard that keeps land beside SSSIs and ancient woodland out of grey belt; if it goes, it goes everywhere.

Ask him to support a parliamentary debate on the protection of land adjoining nationally designated wildlife sites, and to support the parliamentary petition once it opens. A short, polite, specific email works — template T3 at Appendix E is written for exactly this.

A template letter to the MP is at Appendix E, template T3. It is a starting point — a short, specific, personally written letter carries far more weight than a copied one.

4.6 The community petition — and where the national case goes

Tower Farm is not an isolated case. What is happening nationally, and what the campaign is asking Government to change, is set out at section 5.

TAKE ACTION

Sign the community petition — and send it on

The community petition (URGENT 3) is now live at c.org/itsDcnf5nT. It calls on the Prime Minister to intervene and have the Tower Farm and Black Rock allocations removed from the North Somerset Local Plan. When you sign, **enter your postcode when the form asks for it** — that is how the campaign evidences local support for Number 10; without one your signature does not show as local. After signing, Change.org will ask for a donation. You do not need to pay anything — the money goes to Change.org, not the campaign — so skip that page and share the link with three people who live locally instead. Sharing is worth far more than a donation. The Portishead response has been strong, signatures are still rising, and the campaign is arranging to hand the petition in at 10 Downing Street.

The parliamentary petition (RESERVE 2) is the national counterpart, and is covered at section 5.5.

4.7 Two more voices that carry weight locally

Two groups closer to home can shift a decision in a way distant national bodies cannot: councillors answer to their constituents, and the people closest to a danger are the most credible witnesses to it.

SUPPORTING OUR ALLIES

Help the organisations already objecting — don't email them en masse

Avon Wildlife Trust, the Environment Agency, CPRE and both Portishead and Portbury councils are already engaged, and their voice as organisations counts for far more than any volume of emails to them. The best way to help is not to write to them, but to strengthen them and use their weight in your own words.

Join or donate to Avon Wildlife Trust, which owns and manages Weston Big Wood (avonwildlifetrust.org.uk). Draw on CPRE's grey belt research (cpre.org.uk) and name these bodies' positions when you write: the Wildlife Trust and two parish councils objecting, and the Environment Agency raising groundwater concerns, is far harder to set aside than one resident alone.

The High Down school community. The traffic of hundreds of additional cars through The Downs, beside High Down Infant and Junior Schools, at exactly the times children arrive and leave, is felt most directly by the families who do that school run every day — and their evidence on highway safety is more credible than anyone's. If you are a parent, carer, governor or member of staff, a letter in your own words about what you actually see at drop-off carries real weight; a joint letter from a parent group or the governing body carries more.

Your ward councillors. Councillors respond to the residents they represent — and the Local Plan is their council's plan. While the examination is running, the Council can still propose changes ('main modifications') to the Inspectors, including deleting allocations, and councillors who know the strength of local feeling are the ones who press for that from inside. Ask them plainly to: support the removal of Tower Farm and Black Rock from the Local Plan; press for the Council to propose that change to the Inspectors; and put the strength of local feeling on record now, while it can still shape the plan. The Portishead ward councillors are listed below. If you are not sure which ward you live in, check at n-somerset.gov.uk (search 'your councillors') or writetothem.com, which returns both your councillors and your MP from your postcode.

Ward	Councillor	Email
Portishead North	Cllr Timothy Snaden	timothy.snaden@n-somerset.gov.uk
Portishead South	Cllr Peter Burden	peter.burden@n-somerset.gov.uk
Portishead East	Cllr Caritas Charles	caritas.charles@n-somerset.gov.uk
Portishead East	Cllr Roger Whitfield	roger.whitfield@n-somerset.gov.uk
Portishead West	Cllr Nicola Holland	nicola.holland@n-somerset.gov.uk
Portishead West	Cllr Sue Mason	sue.mason@n-somerset.gov.uk

5 The bigger picture — the safeguard, and what happens if it goes

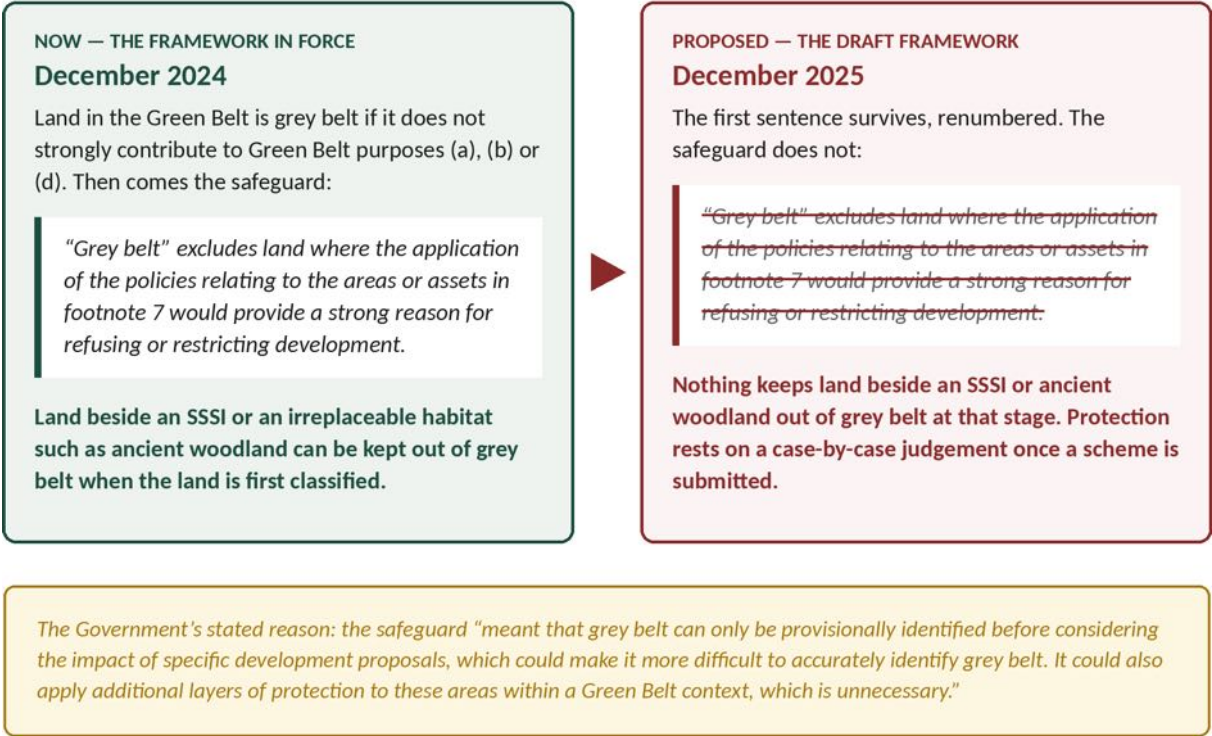
Everything in this pack turns on one sentence of national policy. It is the sentence that keeps land next to a Site of Special Scientific Interest out of the ‘grey belt’ category in the first place, and the Government has proposed deleting it. If it goes, the argument being had here about Weston Big Wood has to be had again at every ancient woodland and every SSSI in England, one application at a time.

5.1 The sentence this all rests on

The grey belt definition sits in Annex 2 of the National Planning Policy Framework, and it has two sentences. The first says what grey belt is: land in the Green Belt which does not strongly contribute to Green Belt purposes (a), (b) or (d). Those letters matter. Paragraph 143 sets out **five** purposes of the Green Belt, and the grey belt test uses three of them. It leaves out purpose (c), assisting in safeguarding the countryside from encroachment, and purpose (e), assisting in urban regeneration. Open countryside can therefore be classed as grey belt however strongly it does the job most people would say the Green Belt is for. [The definition is in Annex 2 of the Framework \(linked at Appendix D\).](#)

The second sentence is the safeguard. It excludes from grey belt any land where the policies protecting the areas and assets listed in footnote 7 of the Framework ‘would provide a strong reason for refusing or restricting development’. Footnote 7 lists Sites of Special Scientific Interest by name. It also lists irreplaceable habitats, and that is how ancient woodland comes within it. Weston Big Wood is both.

That sentence does its work early, when land is first classified. It is meant to stop land beside a nationally important site being labelled grey belt at all, rather than leaving the wood to be argued over scheme by scheme.



The safeguard as it stands, and as the Government proposes to redraft it. Sources: NPPF (December 2024), Annex 2 glossary; National Planning Policy Framework: proposed reforms and other changes to the planning system, and the accompanying draft Framework, published 16 December 2025.

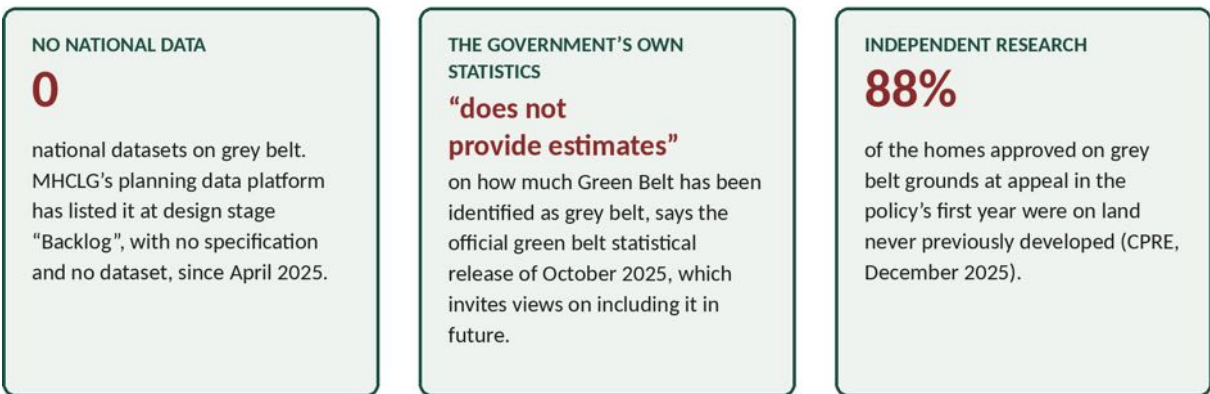
5.2 Nobody is checking whether it works

A safeguard that is not monitored is a safeguard on paper. Since grey belt was introduced in December 2024, no part of government has collected national figures on how it is being used. That is not an inference: the Government says so in its own statistics. The [official green belt statistical release for 2024-25](#), published in October 2025, states that it ‘does not provide estimates on the amount of Green Belt that has been identified as grey belt’, and invites views on whether such figures might be included in future. The [planning data platform](#) run by the Ministry of Housing, Communities and Local Government has listed grey belt at design stage ‘Backlog’, with no specification and no dataset attached, since April 2025.

Parliament noticed early. In February 2025 the House of Lords Built Environment Committee [wrote to the Deputy Prime Minister](#) setting out what its inquiry into grey belt had found. Its chairman, Lord Moylan, put it plainly: ‘The Government also does not seem to have any plan to measure progress or determine the success of this policy. Effective policy must be evidence based and be able to demonstrate its efficacy. Sadly, this is not the case here.’ Eighteen months on, no monitoring has been set up.

The counting is being done by charities instead. CPRE [examined every grey belt appeal decided](#) in the policy’s first year and found 1,250 homes approved on grey belt grounds across thirteen major schemes, 88% of them on land never previously developed. One approved site carried a Local Wildlife Site designation. That research covers appeals only, a small share of all planning decisions, and the campaign does not claim otherwise. It is simply the only picture anyone has.

There is a second gap underneath the first. Neither the Framework nor the planning guidance says what a ‘strong reason for refusing or restricting development’ actually is. There is no threshold and no test. A council deciding whether a wood next door counts is left to work it out for itself, and nobody checks the answer.



Three ways of saying the same thing: the policy is not being measured. Sources: Local authority green belt: England 2024-25 (9 October 2025); MHCLG planning data platform, grey belt planning consideration, last updated April 2025; CPRE and Good Plan Consulting, Grey Belt Planning Appeals Analysis (December 2025).

5.3 And the safeguard may be about to go

On 16 December 2025 the Government published [a consultation on a revised Framework](#), with a draft of the new text alongside it. In that draft the grey belt definition keeps its first sentence and loses its second. The exclusion is not weakened or qualified. It is deleted.

The Government explains why in the consultation itself. The safeguard, it says, meant that grey belt ‘can only be provisionally identified before considering the impact of specific development proposals, which could make it more difficult to accurately identify grey belt’, and it ‘could also apply additional layers of protection to these areas within a Green Belt context, which is unnecessary’. Question 145 of the consultation asks whether the change improves the definition ‘without undermining the general protections given to other footnote 7 areas’.

This needs stating accurately, because overstating it is the quickest way to have it dismissed. Footnote 7 is not being abolished. The list survives in the draft, renumbered, and the underlying policies on SSSIs, irreplaceable habitats, heritage and flood risk all stay in the Framework. What is cut is the link between that list and the grey belt definition, and the effect is a shift in timing: instead of keeping land out of grey belt when it is classified, protection would rest entirely on a case-by-case balance once a scheme is on the table. For a wood already recorded as declining that is a weaker position, and it is weaker everywhere at once.

The consultation closed on 10 March 2026. As this pack went to print in August 2026 no revised Framework had been published; the Government’s Chief Planner had indicated summer 2026, so it could now come at any moment. The decisions are being taken now, which is why the national asks below are time-critical rather than aspirational.

5.4 Why this reaches well beyond Portishead

Weston Big Wood is one wood. The position it is in is not unusual at all: undeveloped land, inside the Green Belt, immediately beside a nationally designated site that is already in poor condition. Every SSSI in England with developable land at its boundary sits in the same position. The safeguard in the grey belt definition is what stands between that land and a label which discounts the harm before anyone has looked at it.

Removing Tower Farm and Black Rock from the Local Plan would protect this wood. It would do nothing for the next one. That is the honest reason the campaign runs a national argument alongside the local one.

WHAT THE CAMPAIGN IS ASKING FOR NATIONALLY

Five changes to the grey belt definition and how it is overseen

1. Test all five Green Belt purposes. The definition currently ignores purpose (c), safeguarding the countryside from encroachment, and purpose (e). Open countryside qualifies as grey belt however well it does that job.

2. Keep the footnote 7 exclusion. Do not proceed with the December 2025 proposal to delete it from the definition. This is the time-critical one: the revised Framework is being finalised now.

3. Say what a ‘strong reason’ is. Neither the Framework nor the guidance defines the phrase the whole safeguard turns on. National criteria would let councils apply it consistently and let anyone check whether they had.

4. Cover adjoining land explicitly. Footnote 7 protects designated sites themselves. It says nothing about land whose development would undermine the site next door: its ecological functioning, its setting, or the buffer it needs. That is the precise gap this case sits in.

5. Count it, and publish it. Create the national grey belt dataset the Ministry’s own platform has listed as backlog since April 2025, publish annual figures on classifications and decisions, and require grey belt assessments to be published with the reasons behind them.

The route to these is Parliament and ministers, not the Local Plan examination. That is why the MP ask at section 4.5 and the parliamentary petition matter as much as the objections do.

5.5 What you can do about the national picture

TAKE ACTION

Two things, and both take ten minutes

Write to Sadik Al-Hassan MP. He has agreed in writing to raise the misapplication of footnote 7 with the Ministry of Housing, Communities and Local Government. Ask him to confirm he has done it and to say what answer he got, and ask him to oppose the deletion of the footnote 7 exclusion from the grey belt definition in the revised Framework. That deletion is the single change that would matter most, and it is still open. Template T3 at Appendix E is written for this.

Sign the parliamentary petition when it opens. It asks the Government to clarify how grey belt policy applies to land adjoining SSSIs, ancient woodland and other nationally protected sites. It is deliberately national and does not mention Tower Farm, so it cannot be set aside as a local complaint. It was submitted on 28 July 2026 and is with the Petitions Committee. A petition gets a written Government response at 10,000 signatures and is considered for debate at 100,000, and that written response would be a public answer to the exact question this campaign has been asking.

The local petition, at section 4.6, is the other half of this. One asks for this wood to be taken out of the plan. The other asks for the rule that would protect the next one.

Appendix A

Glossary of acronyms and terms

Plain English throughout. Where a technical term or acronym is used in the pack, this is what it means.

Term	Meaning here
SSSI	Site of Special Scientific Interest — the principal statutory designation for land of special biological interest. Weston Big Wood is one; damaging an SSSI is an offence.
Ancient woodland	Woodland continuously present since at least 1600. Irreplaceable — it cannot be recreated or offset.
Green Belt / grey belt	Green Belt: land kept permanently open by policy. Grey belt: a 2024 NPPF category of lower-value Green Belt land — excluding land protected by footnote 7 assets such as SSSIs and ancient woodland.
NPPF	National Planning Policy Framework — the Government’s planning policy (December 2024, as amended February 2025, applies here). A December 2025 consultation draft proposes removing the footnote 7 exclusion from the grey belt definition; no final version is published (section 2.1).
CPRE	CPRE, the countryside charity (formerly the Campaign to Protect Rural England) — the national charity whose grey belt research is cited in this pack.
Soundness	The examination test: a plan must be positively prepared, justified, effective, and consistent with national policy.
MIQs	Matters, Issues and Questions — the Inspectors’ agenda for the examination. Written responses and hearings follow their structure.
Regulation 19 representation	A written comment sent in during the Local Plan consultation (Oct–Dec 2025). Having made one is the ticket to speaking at the examination hearings; everyone else can still attend and watch.
Material consideration	A factor the council must weigh when deciding an application — e.g. highway safety, ecology, policy conflict.
EPS	European Protected Species (e.g. bats) — strict legal protection independent of planning permission.
TPO	A local planning authority order protecting specified trees. Works to a protected tree need separate consent, which can be refused on arboricultural grounds alone.
PRoW	Public Right of Way. Several cross the site; diverting one requires a separate legal process.
BNG	Biodiversity Net Gain — a required 10% habitat improvement. Ancient woodland is exempt: it cannot be offset.
S106 / Golden Rules	Developer obligations; for grey belt schemes the NPPF ‘Golden Rules’ require affordable housing, infrastructure and green space commitments — secured, not aspirational.
SNCI	Site of Nature Conservation Interest — a locally designated wildlife site. The eastern grassland at Tower Farm is one.
SAC	Special Area of Conservation — the strictest level of habitat protection in domestic law, derived from the Habitats Regulations. The relevant one here protects horseshoe bat populations.
HEP	Habitat Evaluation Procedure — the Council’s method for assessing land’s value to SAC bat populations. Its 2025 report assesses Tower Farm as Band B for greater and lesser horseshoe bats.
HRA	Habitats Regulations Assessment — the legal assessment of a plan’s effect on protected European-derived sites such as the bat SAC.

Term	Meaning here
EIA / screening opinion	Environmental Impact Assessment — the formal study of a project's likely significant environmental effects. A 'screening opinion' is the council's decision on whether an EIA is required. NSC issued a negative screening opinion on Tower Farm on 24 July 2026 (reference 26/P/0300/EA1). The campaign's formal complaint (reference NSC603122, 31 July 2026) asks the Council to reconsider and adopt a positive opinion — URGENT 2 at section 4.2, template T2 at Appendix E.
Priority Habitat Inventory	The national register of Habitats of Principal Importance (traditional orchards among them). Two records sit on the site's northern boundary, NSOM1047 and NSOM1048; no ecological survey of the trees has been carried out, and the promoter has not carried one out either. The site's hedgerows are a separate priority habitat (section 2.7).
PTES	People's Trust for Endangered Species — the national charity that maintains the traditional orchard inventory.
Red List (BoCC5)	Birds of Conservation Concern 5 (2021) — the UK's official list of its 70 most threatened bird species ('red-listed').
eBird / BRERC / GBIF	Public biological records systems: eBird (birdwatchers' dated checklists), BRERC (the Bristol regional records centre), GBIF (the international archive carrying BRERC data).
IRZ	Impact Risk Zone — Natural England's mapped zone around an SSSI within which a local authority must consult Natural England on certain development. Tower Farm falls within Weston Big Wood's IRZ.
Principal Aquifer	A rock layer of high groundwater importance; the Environment Agency records the site as sitting on one.
PS1	The Council's written Response to the Inspectors' Preliminary Questions (14 July 2026) — quoted throughout as NSC's own statements.
dph	Dwellings per hectare — housing density. The scheme averages c.30 dph, rising to 45 dph centrally.
PSL / Turley / Ridge	Parker Strategic Land, the site promoter; Turley, its planning agents for promotion and public consultation; Ridge and Partners LLP, its environmental and technical consultants, which prepared its Regulation 19 representation and its EIA screening request. GE Consulting (ecology) and PJA / Phil Jones Associates (transport, civils and drainage) also act for the promoter.
Bloor Homes / Aston & Co	Bloor Homes South West, the South West regional division of Bloor Homes Limited, is the promoter and potential developer of the Black Rock allocation; this pack uses 'Bloor Homes'. Aston & Co UK Ltd acted as its planning agents at the Preferred Options stage. Ownership of the land is not established — no public source the campaign has read confirms who holds the freehold, and a promoter may hold an option rather than title, so this pack does not describe Bloor Homes as the owner.
NSC / PTC / AWT / EA	North Somerset Council (the planning authority); Portishead Town Council; Avon Wildlife Trust; the Environment Agency.
SP7 / SP8 / LP5 / DP35 / PEN1–PEN5	Emerging or made plan policies cited in the case: SP7 (Green Belt), SP8 (housing), LP5 (allocations, incl. Tower Farm), DP35 (nature conservation), and made Neighbourhood Plan policies PEN1 (landscape and irreplaceable habitats), PEN2 (green infrastructure network, incl. the LGBI2 corridor), PEN4 (biodiversity) and PEN5 (trees and the Weston Big Wood buffer).

Appendix B

Evidence Register

Every evidence reference (E1, E2 ...) in this pack resolves here. Check anything for yourself — that is the point. (Acronyms are explained in the glossary at Appendix A.)

Ref	Source	What it establishes / where to find it
E1	PSL Vision Document, 'A Vision for Land at Tower Farm, Portishead' (April 2022; RPS / Tyler Grange)	The scheme, access arrangements, buffer, constraints, and the developer's own concessions. NSC consultation portal (n-somerset.inconsult.uk).
E2	Basil Peter Tyler v Avon County Council, Court of Appeal, 26 June 1991; and South West Avon Green Belt Local Plan, Alteration No. 2: Fore Hill, Portishead — Written Statement (December 1991) and General Statement (July 1992, document ACC1)	The 1987 inquiry Inspector's finding on land near the wood, at paragraph 328 of his report, reproduced in the Court of Appeal judgment at General Statement p.108: excluding the site from the Green Belt "would, in my opinion, allow development to be taken too close to the wood". Also: the Court quashed on the adequacy of reasons alone, the Master of the Rolls stating that the court was "not concerned with planning merits"; and Avon County Council's own record that it was "not the judgement of the Court nor a consequence of that judgement that the land is not suitable for designation as Green Belt" (Written Statement para 2.8). Both documents consulted at Weston-super-Mare Library, 31 July 2026, and photographed in full; quotations are working transcriptions from photocopied originals and are checked against the paper before formal use. The 1993 Inspector's report on the second inquiry is not held and is being obtained; no outcome is asserted here. North Somerset Studies, Weston-super-Mare Library
E3	Natural England Designated Sites View — Weston Big Wood SSSI	37.66 ha; notified 3 January 1984; condition 100% Unfavourable – Declining (4 units, generated 16 July 2026); both active pressures are recreational-disturbance impacts. designatedsites.naturalengland.org.uk (unit condition)
E4	Natural England SSSI Impact Risk Zone data	The site falls within the SSSI's impact risk zone. Natural England open data (Magic map).
E5	Gordano Valley ecological study (1988) — Avon Wildlife Trust, WWF and the Nature Conservancy Council	Baseline evidence of the corridor's ecological value. portishead.gov.uk (Gordano Valley ecological study)
E6	Gordano Valley Ecological & Development Strategy Report (2023)	Updated corridor evidence. portishead.gov.uk (Gordano Valley strategy report)
E7	Portishead Town Council Regulation 19 representations & examination response (December 2025)	Soundness objections: Tower Farm site response; policies SP7, SP8, LP5. States traffic from 400 new homes as 'approx. 548 additional cars' (PTC representation, section 2.3) — cite as PTC's estimate of additional vehicles; the underlying calculation is unpublished. portishead.gov.uk/north-somerset-local-plan
E8	NPPF (December 2024, as amended 7 February 2025)	Paras 48, 110–115, 143 + footnote 7, 145, 147, 155–157 + footnote 55 (grey belt, Golden Rules), 193 (irreplaceable habitats). Read with Planning Practice Guidance, Green Belt, paragraphs 64-003, 64-006, 64-011, 64-013 and 64-014. gov.uk

Ref	Source	What it establishes / where to find it
E9	Portishead Neighbourhood Plan (made 19 September 2023) — read in full against the made plan, July 2026	Page-verified policies: PEN1 — avoid any adverse impact on irreplaceable habitats incl. Weston Big Wood (p.30); PEN2 and Figure 4 — the green infrastructure network, incl. the LGBI2 'Gordano Valley Link' corridor through Portishead Down and along the wood (pp.35–37); PEN4 — biodiversity and Species of Principal Importance (p.42); PEN5 — 15–50m buffer to the Ancient Woodland of the SSSI Weston Big Wood, and veteran-tree retention (pp.47–48); Appendix 2 — the Pre-Application Community Engagement Protocol. portishead.gov.uk
E10	PS1 — NSC response to Inspectors' Preliminary Questions (14 July 2026) + PS1a/PS1b	Severn Estuary mitigation standard (A1); windfall data (A4); Nailsea/Backwell deliverability standard (A8); transport status (A11); 7 August housing package incl. site templates (A2/3/5/12). Examination webpage.
E11	Inspectors' Preliminary Questions (30 June 2026)	The Inspectors' lines of enquiry, incl. recreation mitigation and infrastructure dependency. Examination webpage.
E12	Programme Officer correspondence (July 2026)	Representor rights; MIQs anticipated late September 2026; hearing statement rules. info@programmeofficers.co.uk
E13	CPRE, "Research shows most 'grey belt' homes planned on unspoilt countryside" (7 December 2025)	13 major inspector-approved schemes; 88% of their 1,250 homes on previously undeveloped countryside; the 13 schemes account for more than 90% of all homes granted on grey belt sites. cpre.org.uk/news
E14	Persimmon Homes Severn Valley, Reg 19 Additional Sites representation (21 March 2025)	Formal 'No' to Tower Farm suitability on transport, landscape and ecology grounds. Comment ID 31975457//1, repID 12987445; dated capture of the live representation taken 4 August 2026 (on file). NSC consultation portal (n-somerset.inconsult.uk).
E15	Examination webpage	Submission 22 May 2026; three Inspectors; document library. hwa.uk.com/projects/north-somerset-local-plan-2041
E16	Conservation of Habitats and Species Regulations 2017	EPS protection for bats; Natural England three-part licence test. legislation.gov.uk
E17	Emerging Local Plan policies	DP35 (SSSI protection), DP12 (Green Belt / Golden Rules), SP7, SP8, LP5, DP37. NSC Local Plan 2041 documents.
E18	Environment Agency, Reg 19 Additional Sites representation (repID 13007509)	Statutory consultee: the site sits on a Principal Aquifer; hydrogeology, SuDS-infiltration and pollution-pathway grounds. NSC consultation portal.
E19	Avon Wildlife Trust, Reg 19 Additional Sites representation (repID 12951413, 20 March 2025)	The wood's owner/manager objecting to development at or near the SSSI: 'Once damaged they cannot be restored.' NSC consultation portal.
E20	Portbury Parish Council, Reg 19 Additional Sites representation (repID 12929365)	Ecological-function objection: 'loss of ancient woodland cannot be mitigated for.' A second parish council on the record. NSC consultation portal.
E21	NSC Additional Sites consultation — HE2068 comment sweep (17 July 2026)	210 comments on Tower Farm; 196 (93%) answered 'No' to suitability. Full index in the campaign portal record. n-somerset.inconsult.uk (docID 15643252, partid 15731924).
E22	Wyndham Way Opportunity Area Masterplan — 'A Masterplan for Central Portishead', draft for consultation (August 2022)	The Council's own brownfield framework for central Portishead, prepared with Portishead Town Council and a major landowner and publicly consulted on. n-somerset.moderngov.co.uk (documents/s4078 — search 'Wyndham Way Development Framework').

Ref	Source	What it establishes / where to find it
E23	North Somerset Local Plan 2041 as submitted, Policy SP8 (May 2026)	Portishead 1,601 homes: allocations 562; Wyndham Way broad location 'capable of accommodating up to 785 new dwellings over the plan period' (raised from 485); windfall 222–254. Plan total 24,495 against a 23,700 requirement. n-somerset.gov.uk (CD6.4).
E24	County of Avon Planning, Highways and Transport Committee papers, 28 June 1988 — South West Avon Green Belt Local Plan Inquiry Inspector's Report	The committee record of the Inquiry Inspector's recommendations, 28 June 1988: Portishead Down land added to the Green Belt site by site ('should be retained open'); a tighter boundary off Weston Road rejected as 'detrimental to the sensitive nature of Weston Big Wood'. Eight photographed pages held; full report at Bristol Archives.
E25	South West Avon Green Belt Local Plan, Written Statement — Avon County Council, adopted 29 December 1988 (ISBN 0-86063-424-8)	The adopted plan itself (17pp, obtained from North Somerset Council's Town Hall copy, July 2026). Section 9 boundary justification — the Portishead/North Weston/Redcliff Bay segment drawn for 'protection of the setting and character of... Weston Big Wood', with no 'provision for possible future development'; Policy GBLP.2; permanence wording at paras 1.3 and 4.2.
E26	South West Avon Green Belt Local Plan, Inset Map 6 and key/title sheet — September 1988, 1:10,000, Avon County Council	The adopted plan's Portishead map: Portishead Down, Weston Big Wood and Nightingale Valley within the designated Green Belt (GBLP 1). Key/title sheet bears the County Planning Officer's name (H.E. Stutchbury). Obtained from North Somerset Council, July 2026.
E27	North Somerset Council Habitat Evaluation Procedure report — Avondale Ecology (October 2025)	The Council's own bat evidence: Tower Farm assessed Band B for greater and lesser horseshoe bats — suitable habitat, within the new bat consultation zones, functionally linked foraging habitat. Obtained and checked against the original by the campaign, July 2026.
E28	Habitats Regulations Assessment of the Local Plan — AECOM (October 2025)	The Council's own HRA: Tower Farm 'has the potential to have an adverse impact on functionally linked land' for the bat SAC; mitigation resting on Nature Parks at Nailsea/Backwell and Wolvershill/Banwell, not Portishead; an apparent discrepancy with the HEP on compensation scale (c.9 ha vs c.0.5 ha). Obtained and checked against the original by the campaign, July 2026.
E29	PTES orchard and hedgerow advice and Priority Habitat Inventory confirmation (Steve Oram, Orchard Biodiversity Officer), with the campaign's site visit (July 2026)	Direct correspondence, 24–25 July 2026: the northern boundary functions as a habitat mosaic (mature hedgerows, deadwood, scrub, rough grassland, cattle grazing) connected to the adjacent SSSI, and the site's hedgerows are a separate priority habitat whose loss must be compensated under biodiversity net gain. On the inventory entries: two traditional orchard records sit along this boundary, NSOM1047 and NSOM1048. The campaign walked and photographed the boundary on 25 July 2026 (six dated photographs). What a full ecological survey would make of the trees — their number, their age, and whether any meet the criteria for veteran status — has not been assessed, and the promoter has not assessed it either. The eastern 'green wedge' quote is PSL's own Vision Document, p.16 (E1).
E30	eBird — Weston Big Wood hotspot L1374172 (records read directly, 24 July 2026)	52 species recorded; nine BoCC5 Red List, each with date, count and named observer (seven recorded 2023–2026, five in 2026); aggregated all-years data shows seasonal windows incl. a recurring Feb–June Linnet presence. ebird.org/hotspot/L1374172
E31	BRERC records via the GBIF occurrence API (re-verified 24 July 2026)	Farmland Red List assemblage on the Tower Farm 1km square: wintering Lapwing flocks to 350 (2002); Skylark 2001–2005; Marsh Tit in the wood 1998–2017 corroborating the 2026 eBird record. Further species held pending individual re-verification. gbif.org

Ref	Source	What it establishes / where to find it
E32	Natural England / Forestry Commission standing advice — ancient woodland, ancient and veteran trees (14 January 2022)	A material planning consideration: 15m minimum ancient-woodland buffer, larger where impacts extend further (incl. traffic air pollution); veteran-tree buffer of 15× diameter or 5m beyond crown; no development within a buffer zone; compensation not to be weighed in assessing merits; poor condition no reason to permit. gov.uk/guidance/green-belt (ancient woodland advice)
E33	North Somerset Council EIA screening decision on Tower Farm — reference 26/P/0300/EA1, decision notice 24 July 2026 (issued 143 days past the statutory target of 3 March 2026)	The full decision, delegated report and all 16 documents in the screening record have been obtained from the NSC planning portal and reviewed by the campaign. The consultee positions are set out at section 2.3 and sourced at E41 and E42. On the groundwater point: the applicant's engineers first stated there were 'no springs' on or near the site (letter of 13 May 2026); three weeks later, after a meeting with the LLFA, they were obliged to address five — including one within Weston Big Wood some 80 metres from the site boundary. The LLFA withdrew its EIA objection only on condition of groundwater monitoring across a full seasonal cycle, which has not been carried out. Exolum, operator of the high-pressure oil pipeline crossing the site, has an unresolved formal objection. NSC planning portal (planning.n-somerset.gov.uk , keyVal TA8XSJLP00G00).
E34	Portishead Town Council — record of first contact from the site's promoters (July 2026)	The Town Council's account: first contact from the Tower Farm promoters came only around the start of 2026, with the council having to establish for itself who was promoting the site — no 'Day One' engagement under the made Neighbourhood Plan's Pre-Application Community Engagement Protocol. Attributed; the precise date is being confirmed from council records.
E35	North Somerset Council — Stage 2 Green Belt Assessment (October 2025, version 2)	The origin of the grey belt classification of this land. Appendix 2, row 'Portishead 6 – Tower Farm' (pp.128–129); summary at pp.19–20; parcel description at p.46, recording the parcel as bounded partly by Weston Big Wood. The footnote 7 screening for the parcel records the absence of scheduled monuments and does not address the SSSI or the ancient woodland. Read in full from the examination library, July 2026.
E36	North Somerset Council — Green Belt Review Background Paper (October 2025)	The Council's account of the Green Belt releases proposed through the plan, including at Portishead. Read alongside E35 as the Council's own explanation of how it reached its releases.
E37	Arup for the West of England Combined Authority — Strategic Green Belt Assessment Stage 1 Interim Report (reference 4-50, 30 October 2025)	Assesses strategic parcel P-002, within which the Tower Farm site sits. It names Weston Big Wood SSSI and the ancient woodland, and states that the extent and scale of constraints may make the parcel unsuitable to be considered grey belt, requiring further assessment at a later stage. No record of that assessment has been found. Stated at parcel level, the level at which the report assesses.
E38	Parker Strategic Land — Regulation 19 representation to the North Somerset Local Plan (9 December 2025), prepared by Ridge and Partners LLP	The promoter adopts the Council's grey belt classification of the site; it carries out no grey belt assessment of its own. Obtained from the examination consultation portal and read by the campaign, July 2026.
E39	North Somerset Council — Regulation 22 Consultation Statement (May 2026)	States that there are no Sites of Special Scientific Interest in the vicinity of the Tower Farm allocation, and describes Weston Big Wood as a local wildlife site (p.308). Both statements are wrong. The same document elsewhere refers to the SSSI (pp.69, 178, 514, 515). Verified against the document, July 2026.

Ref	Source	What it establishes / where to find it
E40	Defra — 30by30 on Land in England: Delivery Plan; and the Environmental Improvement Plan SSSI condition target	The Delivery Plan states: ‘Our protected sites – made up mostly of SSSIs – form the backbone of delivery for 30by30 on land’. A site counts only where its features are in favourable, or unfavourable but recovering, condition; protected sites supply 6.4 of the 7.1 percentage points currently counting. The statutory commitment alongside it is 75% of SSSI features in favourable condition by 2042. Published on gov.uk.
E41	Natural England — EIA screening consultation response (9 March 2026, our ref 542148)	The statutory adviser’s written reply on 26/P/0300/EA1: the development “has potential likely significant effects on statutorily designated nature conservation sites or landscapes and further consideration is required”. Seven sites are listed, among them the Weston Big Wood, Nightingale Valley and Weston-in-Gordano SSSIs and the Severn Estuary designations. Natural England adds that it has not assessed the significance of any impacts itself. NSC planning portal, document 3572305.
E42	North Somerset Council — delegated officer report, EIA screening opinion 26/P/0300/EA1 (24 July 2026)	The reasoning behind the negative opinion: nine required assessments; a screening checklist recording that 13 of its 21 questions indicate a possible adverse effect; the conclusion that the development is “likely to have localised impacts only, which can be addressed through the planning application process” (page 11); and the discounting of cumulative impact with Black Rock and Wyndham Way because allocations in an emerging plan are not “approved development”. NSC portal, document 3630851.
E43	North Somerset Council — Strategic Housing Land Availability Assessment 2025 (main report, Table 11); Schedule of all potential sites (November 2024); Policy SP7 of the Regulation 19 pre-submission plan; and the Council’s consultation library filings for Black Rock	The Black Rock allocation record: reference HE20124, ‘Black Rock, North of Clevedon Road’, around 100 dwellings, released from the Green Belt under Policy SP7. The consultation filings identify Bloor Homes South West as promoter, with Aston & Co UK Ltd as agent at the Preferred Options stage. None of these sources evidences ownership, which the campaign records as an open question pending a Land Registry title search. Planning register checked 4 August 2026: no application for the allocation. n-somerset.gov.uk (SHLAA 2025)

Appendix C

Campaign timeline

When	What
June 2025	Tower Farm added to draft allocations (Additional Sites consultation)
30 October – 12 December 2025	Regulation 19 consultation — representations made (incl. PTC's)
22 May 2026	Plan submitted for examination
30 June – 16 July 2026	Inspectors' Preliminary Questions; Council's response (PS1); third Inspector appointed
22 July 2026	The adopted 1988 Green Belt plan (Written Statement and Inset Map 6) obtained from the Council; the Council's own bat assessments (HEP and HRA) obtained and checked by the campaign
23–24 July 2026	Residents' joint objection sent to PSL as its pre-application feedback window closes; Woodland Trust confirms its 'woods under threat' team is tracking the wood; red-listed bird evidence compiled from eBird and BRERC records; Natural England/Forestry Commission standing advice logged
24 July 2026	NSC issues negative EIA screening opinion at Tower Farm (26/P/0300/EA1) — decision 143 days late, overruling the settled advice of the Council's own Lead Local Flood Authority, the Internal Drainage Board and Portishead Town Council; the campaign wrote to the case officer the same day, and its formal complaint followed on 31 July (reference NSC603122), asking the Council to reconsider (URGENT 2 in section 4.2; template T2 at Appendix E)
25 July 2026	The campaign surveys the orchard with dated photographs and reports its condition to PTES; PTES's Orchard Biodiversity Officer confirms the Priority Habitat Inventory entry (NSOM1048), which stands unless a full survey demonstrates fewer than five fruit trees remain (section 2.7)
7 August 2026	Council's housing package due — incl. Tower Farm site template
~28 September 2026	Formal notice of the hearings due, with the Inspectors' MIQs and Guidance Note; representors notified; hearing statements due about two weeks before each session
9 November – 7 December 2026	Hearing sessions confirmed (3 August 2026, examination website): weeks of 9, 16 and 30 November and 7 December 2026, reserve week from 18 January 2027
Later in 2026, if at all	A PSL outline application (the Council expects one later this year) — alerts and residents' channels will catch it; the campaign's focus stays on the examination

Appendix D

Sources and links — where to check everything

Every source below is public. Where a link is given you can open it and read the original for yourself.

Consultation portal — the primary record

Source	Link
Full Tower Farm (HE2068) comment list — all 210 representations	n-somerset.inconsult.uk/Reg19AddSites/listRepresentations?docID=15643252&partid=15731924
Persimmon Homes Severn Valley — ‘No’ to suitability	n-somerset.inconsult.uk/Reg19AddSites/viewRepresentation?repID=12987445
Avon Wildlife Trust objection	n-somerset.inconsult.uk/Reg19AddSites/viewRepresentation?repID=12951413
Environment Agency (Principal Aquifer)	n-somerset.inconsult.uk/Reg19AddSites/viewRepresentation?repID=13007509
Portishead Town Council objection	n-somerset.inconsult.uk/Reg19AddSites/viewRepresentation?repID=12973461
Portbury Parish Council objection	n-somerset.inconsult.uk/Reg19AddSites/viewRepresentation?repID=12929365
EIA screening file for Tower Farm (26/P/0300/EA1) — decision, officer report and all consultee responses	planning.n-somerset.gov.uk (search the reference)
Natural England — EIA screening consultation response, 9 March 2026 (seven designated sites)	planning.n-somerset.gov.uk (document 3572305)

Council, plan and neighbourhood plan

Source	Link
North Somerset Council — Local Plan 2041 (DP35, SP7/SP8, LP5, IDP, Green Belt Review); planning portal alerts as a precaution	n-somerset.gov.uk
Portishead Town Council — made Neighbourhood Plan (Policies PEN1–PEN5) and examination representations	portishead.gov.uk
1988 Gordano Valley ecological study (Avon Wildlife Trust, WWF and the Nature Conservancy Council)	portishead.gov.uk (Local Plan page)
2023 Gordano Valley Ecological & Development Strategy Report	portishead.gov.uk (Local Plan page)
North Somerset Council — Stage 2 Green Belt Assessment (October 2025) and Green Belt Review Background Paper	n-somerset.gov.uk (Local Plan examination library)
Arup for the West of England Combined Authority — Strategic Green Belt Assessment Stage 1 Interim Report (30 October 2025)	westofengland-ca.gov.uk

Government, statutory and data sources

Source	Link
NPPF (December 2024, as amended 7 February 2025) — paras 11(d), 48, 110–115, 143, 155–157, 193 and footnote 7; December 2025 consultation draft of the revised NPPF (proposes removing the footnote 7 exclusion; no final version published)	gov.uk/government/publications/national-planning-policy-framework--2
Ancient woodland standing advice (Natural England / Forestry Commission)	gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions
Natural England Designated Sites — Weston Big Wood SSSI (37.66 ha; notified 3 January 1984; 100% Unfavourable – Declining)	designatedsites.naturalengland.org.uk (unit condition)
MAGIC (Defra) — SSSI Impact Risk Zone at the site (grid ST45477549)	magic.defra.gov.uk
South West Avon Green Belt Local Plan, Alteration No. 2: Fore Hill — Written Statement and General Statement (North Somerset Studies, Weston-super-Mare Library)	North Somerset Studies, Weston-super-Mare Library
Conservation of Habitats and Species Regulations 2017 (bats / EPS); Environment Act 2021 (biodiversity net gain); Highways Act 1980 (public rights of way)	legislation.gov.uk/ukxi/2017/1012
Planning Practice Guidance — Green Belt: paragraphs 64-003, 64-006, 64-011, 64-013 and 64-014 (grey belt identification, openness and the weight given to Green Belt harm)	gov.uk/guidance/green-belt
Defra — 30by30 on Land in England: Delivery Plan; Environmental Improvement Plan (75% of SSSI features in favourable condition by 2042)	gov.uk (30by30 delivery plan)

National context and allies

Source	Link
CPRE — “Research shows most ‘grey belt’ homes planned on unspoilt countryside” (7 December 2025); and the South Gloucestershire Council grey belt motion, 15 July 2026	cpre.org.uk/news
Avon Wildlife Trust — owner/manager of Weston Big Wood; formal objector	avonwildlifetrust.org.uk
Woodland Trust — buffer-zone guidance (case-by-case, no one-size-fits-all)	woodlandtrust.org.uk
Open Spaces Society — Green Belt purpose / openness framing	oss.org.uk

Source	Link
Parker Strategic Land developer site (opposition watch — source of the admissions used here)	towerfarmportishead.co.uk

Appendix E

Starting templates — ready to personalise

These are starting points, not scripts. Decision-makers discount identical letters; they weigh personal, specific, accurate ones. Replace every bracketed prompt with your own words and experience, and delete anything that is not true for you.

T1 Email to your ward councillors (URGENT 1 — do it today)

BOTH TRACKS

Send to the councillors for your Portishead ward — their addresses are in section 4.7 and at Appendix F. If you are not sure which ward you are in, check at n-somerset.gov.uk (search 'your councillors') or writetothem.com.

Subject: Please support removing Tower Farm and Black Rock from the North Somerset Local Plan

Dear Councillor [name],

I am a resident in your ward, writing about the Tower Farm and Black Rock allocations in the North Somerset Local Plan, now at examination — up to 400 homes on long-established Green Belt pasture directly beside Weston Big Wood, and around 100 more on the wood's far side. Weston Big Wood is a Site of Special Scientific Interest and ancient woodland that Natural England records as being in 'Unfavourable – Declining' condition; together these allocations would close in on it from both sides.

I am asking for your help on two things. First, please support the removal of both sites from the Local Plan, and press for the Council to propose that change to the Inspectors while the examination is still running. Second, please put the strength of local feeling on record now — the examination is the moment it can still shape the plan.

My main concerns are: the single vehicular access via The Downs, a residential cul-de-sac beside High Down Infant and Junior Schools; harm to the SSSI and ancient woodland, which is irreplaceable and already in recorded decline; the severance of the wildlife corridor to Nightingale Valley and the Gordano Valley; and the misapplication of 'grey belt' to land that national policy (NPPF footnote 7) should exclude because it sits next to a nationally important wildlife site.

[Add a sentence or two in your own words — what you see at the school run, what the wood and pasture mean to you.]

I would be grateful to know whether you will support the removal of these sites from the Local Plan, and I am happy to provide further detail.

Yours sincerely, [name, address and postcode].

T2 Complaint to North Somerset Council about the EIA screening decision (URGENT 2 — send this week)

APPLICATION TRACK

How to complain — the online form, step by step

North Somerset Council has a formal complaints process, and anyone affected can use it. Please make a complaint about the decision that no Environmental Impact Assessment is required for Tower Farm, reference 26/P/0300/EA1.

[Complain to North Somerset Council](#)

Filling in the form. Log in, or register — it is easy. The form asks seven things and takes about ten minutes. Here is what to put.

Q1 Subject of your complaint. EIA screening decision 26/P/0300/EA1, land at Tower Farm, next to Weston Big Wood.

Q2 Who is this complaint for. Myself.

Q3 Full details of your complaint, and how you think it should be resolved. This is the important box, and please write it in your own words. Identical letters get treated as one complaint and answered once, so two sentences of your own carry more weight than a page copied from someone else. The points worth making: the Council decided on 24 July that up to 400 homes beside a Site of Special Scientific Interest and ancient woodland do not need a full Environmental Impact Assessment; the decision came nearly five months after the legal deadline for making it; and it was made against the advice of the Council's own drainage authority, the Internal Drainage Board, Portishead Town Council, and the developer's own ecologist, who could not rule out significant environmental effects.

Then say how it affects you personally. The Council can decline complaints from people with no connection to the matter, so say that you live in Portishead, that you walk in the wood, that your children go to school on The Downs — whatever is true for you. One line is enough.

Q4 Which service does your complaint relate to. Open the dropdown, find Planning and Building Control, and choose Planning.

Q5 Supporting files. Leave blank, or attach the campaign's public [environmental pack](#) if you would like to.

Q6 I have already spoken to someone at the Council about this issue. Answer honestly. For most people that is no.

Q7 What outcome do you want. Ask for the screening decision to be reconsidered and a fresh screening opinion issued, and ask for your complaint to be placed on the public case file for 26/P/0300/EA1. You will get an acknowledgement and a reference number.

If you would rather send an email, the letter below does the same job — send it to the case officer and copy the director, as set out underneath.

To: Jason.Mak@n-somerset.gov.uk (case officer). Copy: matt.lenny@n-somerset.gov.uk (Director of Healthy and Sustainable Communities).

Subject: Objection to the EIA screening decision — Tower Farm, Portishead (reference 26/P/0300/EA1)

Dear Mr Mak,

I am writing to object to North Somerset Council's decision of 24 July 2026 that no Environmental Impact Assessment (EIA) is required for the proposed development of up to 400 homes at Tower Farm, Portishead.

An EIA is a legal process that requires the developer to identify, assess, and make public the likely significant environmental effects of a development before a planning decision is taken. Where an EIA is screened out — as here — those effects receive no independent scrutiny and the public has no right to see or comment on a formal assessment. Given the location of this site immediately adjacent to Weston Big Wood, a Site of Special Scientific Interest and ancient woodland already recorded by Natural England as being in unfavourable condition, I believe the decision to screen out an EIA is wrong for the following reasons.

1. The Council's own advisers said an EIA was needed.

The Council's Lead Local Flood Authority formally recommended that an EIA be required — and repeated that recommendation when it was first set aside. The Internal Drainage Board agreed. Portishead Town Council agreed. All three consultees were overruled.

2. The developer's own ecologist could not rule out significant environmental effects.

The applicant's ecological report could not rule out significant environmental effects on ecological receptors — in its own words, the prospect of the development constituting EIA development 'cannot be ruled out'. That is the legal test for whether an EIA is required. If the developer's own expert cannot satisfy it, it is difficult to understand how the Council can reach the opposite conclusion.

3. The developer initially said there were no springs on the site. Five were subsequently found.

One of those springs lies within Weston Big Wood, some 80 metres from the site boundary, within a designated drinking-water source protection zone. Despite this, the Council accepted the developer's case. It did so even though the groundwater survey work that the developer's own documents identify as necessary has not yet been carried out.

4. The decision took nearly five months, and concluded that the effects would be “localised”.

The legal timeframe for a screening decision is three weeks. This decision took close to five months. Its officer report concludes that the development is “likely to have localised impacts only, which can be addressed through the planning application process” (delegated report, page 11). That conclusion is difficult to credit for a site where the same report requires nine separate technical assessments, records that thirteen of the twenty-one screening questions indicate a possible adverse effect, and where the flood authority’s condition — groundwater monitoring across a full seasonal cycle — has not been carried out.

I ask North Somerset Council to reconsider its screening decision and to require a full Environmental Impact Assessment before any planning application for this site is determined. I also ask that this letter be treated as a formal complaint under the Council’s corporate complaints procedure, and that it be placed on the public case file for 26/P/0300/EA1.

[Add a line or two here, in your own words, about why Weston Big Wood and this land matter to you — a personal reason carries more weight than a standard letter.]

Yours sincerely, [name, address and postcode].

T3 Letter to your MP (IMPORTANT 1 — the national ask)

NATIONAL — POLICY, NOT THIS EXAMINATION

To: sadik.alhassan.mp@parliament.uk — Subject: Grey belt policy and Tower Farm, Portishead

Dear Mr Al-Hassan,

I am a constituent writing about the Tower Farm and Black Rock allocations in the North Somerset Local Plan, now at examination, and about the wider national problem they illustrate.

Tower Farm is long-established pasture in the Green Belt, directly beside Weston Big Wood — a Site of Special Scientific Interest and ancient woodland that Natural England records as being in ‘Unfavourable – Declining’ condition. With the Black Rock allocation on the wood’s far side, some 500 new homes would close in on the wood from both sides. Land next to assets like these is meant to be excluded from grey belt under footnote 7 of the National Planning Policy Framework, yet Tower Farm has been drawn into a grey belt assessment and allocated for up to 400 homes.

I understand that the examination is independent, and that its procedure does not allow the Inspectors to receive correspondence from those who did not take part in the formal consultation. I am not asking you to write to the examination. I am asking you to act on the national policy problem this case exposes: the guidance and the checks are not strong enough to stop undeveloped land next to nationally important sites being treated as grey belt in the first place — and the December 2025 consultation draft of the revised National Planning Policy Framework proposes removing the footnote 7 exclusion altogether. Footnote 7 is the key safeguard preventing open land beside SSSIs and ancient woodland being treated as grey belt; removing it would take that safeguard away everywhere. CPRE’s research shows most homes approved on grey belt land nationally are on previously undeveloped countryside.

I would be grateful if you would: oppose the removal of the footnote 7 exclusion in the revised Framework; raise the misapplication of footnote 7 with the Ministry of Housing, Communities and Local Government; ask what checks apply before undeveloped land beside an SSSI or ancient woodland can be classified as grey belt; and support a parliamentary debate on strengthening that protection. I will also be signing the parliamentary petition on this issue and hope you will support it.

[Add one or two sentences in your own words: why this place matters to you, and what you want protected.]

Yours sincerely, [name, full address and postcode — an MP will normally only act for constituents, so please include these].

T4 Registering for the examination (IMPORTANT 3 — send now)

EXAMINATION TRACK

To: info@programmeofficers.co.uk — Subject: North Somerset Local Plan 2041 — Tower Farm, Portishead

Dear Programme Officers, I am writing about the Tower Farm allocation (Land at Tower Farm, Portishead) in the North Somerset Local Plan 2041 examination. Please add me to any notification list for the examination, let me know when the Matters, Issues and Questions and the draft hearing programme are published, and advise how members of the public can follow or attend the hearing sessions covering the Portishead allocations and Green Belt. Yours faithfully, [name, address].

If you made a Regulation 19 representation during the consultation, add: "I made a representation at Regulation 19 on this allocation [add your comment ID or the date, if known] — please also confirm I am recorded as a representor and advise how to request to participate in the hearings."

(Anyone may attend the hearings as an observer. The right to be heard at the hearings belongs to those who made a Regulation 19 representation during the consultation — everyone else's voice travels through councillors, the MP and the Town Council.)

T5 Objection to an outline application (RESERVE 1 — HOLD: for use only if an application is ever submitted)

APPLICATION TRACK — PARKED

Do not use this template now. There is no planning application, no reference number, and nothing to object to — the live decision is the Local Plan examination (section 4). This template is pre-loaded so that if Parker Strategic Land ever applies, residents are ready within hours, not weeks. If that happens, North Somerset Council will publish the application on its online planning register with a reference in the form YY/P/NNNN/OUT; Portishead Town Council and the residents' channels will flag it loudly, and your IMPORTANT 4 alert will catch it. Only then does this page come into play.

To: North Somerset Council, Planning Department (via the online planning register, citing the application reference)

Application reference: [insert the YY/P/NNNN/OUT reference from the portal] — Land at Tower Farm, Portishead

I object to this application and ask that it be refused, for the following material planning reasons.

Highway safety. The sole vehicular access for the proposed 400 homes is via The Downs, a residential cul-de-sac network beside High Down Infant and Junior Schools. [Describe what you personally see at drop-off and pick-up times — congestion, parking, children crossing.] The applicant's own material confirms Tower Road is limited to emergency, pedestrian and cycle use. The residual cumulative impact on this network is severe and the impact on highway safety unacceptable (NPPF paragraphs 110–115).

Harm to Weston Big Wood SSSI and ancient woodland. Natural England's published assessment records the SSSI as 100% 'Unfavourable – Declining', with recreational-disturbance impacts among its recorded active pressures. Placing 400 households within walking distance will worsen the very mechanism causing decline. Ancient woodland is irreplaceable (NPPF paragraph 193) and the proposed buffer does not address recreational pressure. The proposal also conflicts with emerging Policy DP35 and made Neighbourhood Plan Policy PEN4.

Ecology and protected species. The site forms part of the corridor linking Weston Big Wood with Nightingale Valley and the Gordano Valley SSSIs; development would sever it. Bats are among the protected species the corridor supports; they are European Protected Species and the licensing tests are not plausibly met here.

Green Belt. The site is long-established pasture in the Green Belt. The 'grey belt' designation is misapplied: NPPF footnote 7 excludes land where SSSI and ancient woodland policies provide strong reason to restrict development. Very special circumstances have not been demonstrated, and the applicant's own assessment concedes harm to openness.

A brownfield alternative exists. The Council has its own plan for new homes in the centre of Portishead: the Wyndham Way masterplan, consulted on in 2022, identifies brownfield land between the High Street, the Marina and the new railway station which the Local Plan describes as capable of accommodating up to 785 homes. With a more sustainable alternative available near the station, very special circumstances for building on Green Belt pasture beside an SSSI have not been demonstrated. [Add a sentence in your own words on where you would rather see new homes, for example near the station and the High Street rather than on the hillside above the schools.]

Deliverability of claimed benefits. The school and Merlin Park proposals depend on land the applicant does not control; rights-of-way diversions are unconfirmed; a pipeline easement crosses the site; and no viability appraisal is published. These benefits cannot be given weight.

[Add one paragraph in your own words: what this place means to you, what you use and see — the wood, the paths, the school run, the wildlife.]

I request that this application be determined by the planning committee and that objectors be heard. Please refuse permission. *Name, address, date. (Objections must include your address to be counted.)*

Appendix F — Useful contacts

Examination Programme Officers — Helen Wilson and Yvonne Parker · info@programmeofficers.co.uk · 01432 639547 / 01282 450522. Register as a representor and ask to be notified of the MIQs and hearing programme.

North Somerset Council planning portal — n-somerset.gov.uk — set an alert for the Tower Farm area so any application is spotted at once; none exists today.

Portishead Town Council — Planning Advisory and Placemaking Group — savewestonbigwood@gmail.com. The campaign's formal coordination point; documents route through the Group.

Portishead ward councillors (NSC) — Ask them to support removing Tower Farm and Black Rock from the Local Plan. North: Cllr Timothy Snaden (timothy.snaden@n-somerset.gov.uk). South: Cllr Peter Burden (peter.burden@n-somerset.gov.uk). East: Cllr Caritas Charles (caritas.charles@n-somerset.gov.uk) and Cllr Roger Whitfield (roger.whitfield@n-somerset.gov.uk). West: Cllr Nicola Holland (nicola.holland@n-somerset.gov.uk) and Cllr Sue Mason (sue.mason@n-somerset.gov.uk).

Sadik Al-Hassan MP — sadik.alhassan.mp@parliament.uk — asked to raise the grey belt misapplication nationally.

Avon Wildlife Trust — avonwildlifetrust.org.uk — owner and manager of Weston Big Wood SSSI; a formal objector.

Woodland Trust — woodlandtrust.org.uk — the national ancient-woodland charity. Its 'woods under threat' team is already tracking Weston Big Wood and has asked to be notified with the reference number the moment a planning application is validated on the NSC portal. Contact then: enquiries@woodlandtrust.org.uk.

Natural England — The statutory adviser on the SSSI and ancient woodland — being pressed for representations at examination and application stage.

CPRE — cpre.org.uk — the national evidence-holder on grey belt misuse.

500 Homes Around Weston Big Wood — Tower Farm & Black Rock — August 2026 edition, v3.9

A community information document prepared by Portishead residents. Please check you have the current version before circulating.